SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

For City of Cleveland Department of Port Control at Cleveland Hopkins Airport

Prepared for:

City of Cleveland Department of Port Control Cleveland, Ohio



Project No.: 11436 Date: 04/15/2019 Updated: 5/6/2022

Prepared by:



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Authorization for Release

The analyses, opinions, and conclusions in this document are based entirely on EnviroScience's unbiased, professional judgement. EnviroScience's compensation is not in any way contingent on any action or event resulting from this study.

The undersigned attest, to the best of their knowledge, that this document and the information contained herein is accurate and conforms to EnviroScience's internal Quality Assurance standards.

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05/06/2022

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EXECUTIVE SUMMARY

This Spill Prevention, Control and Countermeasure (SPCC) Plan (hereafter, the "Plan") addresses the containers, equipment, facilities, and associated infrastructure regulated or required under Title 40 Code of Federal Regulations (CFR) Part 112 and exclusively operated by the City of Cleveland, Department of Port Control (DPC) at the Cleveland Hopkins International Airport (hereafter, "Facility" or CLE).

The Plan is organized and presented in a sequence consistent with the SPCC Plan regulation. To avoid repetition of certain topics, the Plan user is referred to later sections where the topics are presented in greater detail.

By preparing this Plan, DPC in no way removes any contractual or statutory obligations of other entities operating at CLE from complying with all applicable local, State, or Federal regulations, including the development and implementation of an individual SPCC plan under 40 CFR Part 112. DPC is not responsible for the adequacy, accuracy, or effectiveness of SPCC plans developed by other entities operating at CLE, including any spill prevention or response procedures contained therein. Upon request, DPC will provide other regulated entities operating at CLE available information relating to shared storm water detention infrastructure, storm water conveyance infrastructure, or other infrastructure that may be impacted by an oil spill, or that may be used to prevent a discharge of oil to navigable waters as described in 40 CFR 112.1(b).

DPC has identified the following entities operating at CLE as potentially being regulated at the time this Plan was prepared under 40 CFR Part 112, and may be required to prepare an SPCC plan specifically addressing their operations:

- Air BP
- Alamo Rental Car
- Atlantic Aviation
- Avis Rental Car
- Budget Rental Car
- Constant Aviation
- Dollar Rental Car
- Enterprise Rental Car
- Federal Aviation Administration (FAA)
- Hertz Rental Car
- JETS FBO
- KeyCorp
- Menzies Fuel Storage Facility
- Menzies Into-Plane Fueling/Maintenance
- National Rental Car
- Parker Hannifin
- National Weather Service (NWS)
- Swissport
- Thrifty Rental Car
- United Airlines



1.0 **CERTIFICATIONS AND LOCATION OF PLAN**

1. PROFESSIONAL ENGINEER CERTIFICATION

By means of this certification, I attest the following:

- i. I am familiar with the requirements of 40 CFR Part 112;
- ii. I or my agent has visited and examined the Facility;
- iii. This Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of this part;
- iv. Procedures for required inspections and testing have been established; and,
- This Plan is adequate for the Facility. ٧.

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Name:	Sheila D. Rayman, P.E.	Seal:	SHEILAD.
Signature:	Shulad Kogram.		* RAYMAN E-68368
Registration:	PE 68368		HINGONAL ENSTITUTION
State:	Ohio		
Date:	05/06/2022		

This certification in no way relieves DPC of its duty to prepare and fully implement this Plan in accordance with the requirements of 40 CFR Part 112. This Plan is valid only to the extent that DPC installs, maintains, tests, and inspects equipment and materials, trains personnel, and maintains documentation as specified. This certification is maintained with the Master Copy of this Plan

LOCATION OF PLAN

A complete copy of this Plan is maintained at the Facility in the Spill Coordinator's office. Copies of the Plan are maintained at the Airport Rescue and Fire Fighting (ARFF) building. The Facility and Spill Coordinator's address is:

Cleveland Hopkins International Airport 5300 Riverside Drive Cleveland, Ohio 44135



QUALIFIED FACILITIES

Regulated bulk storage containers at the Facility have an aggregate aboveground oil storage capacity greater than 10,000 gallons. Therefore, the Facility does not meet the requirements of a qualified facility that may self-certify its SPCC Plan.

DPC MANAGEMENT CERTIFICATION

I hereby certify that the necessary resources to prepare and fully implement this Plan have been committed.

Name:	
Title:	
Signature:	
Date:	



2.0 AMENDMENT OF PLAN BY REGIONAL ADMINISTRATOR

If this Facility discharges more than 1,000 gallons of oil in a single discharge event or discharges more than 42 gallons of oil in each of two discharge events within a 12-month period to navigable waters, DPC shall submit the following information to the United States Environmental Protection Agency (USEPA) Region 5 Administrator within 60 days:

- Name of the Facility
- Name of the owner or operator of the Facility
- Location of the Facility
- Maximum storage or handling capacity and daily throughput
- Corrective actions and/or countermeasures taken
- Description of the Facility, including maps and diagrams
- Causes of the discharge, including failure analysis
- Additional preventive measures taken or contemplated
- Other information required by the Regional Administrator

In the event of a discharge as described above, a complete copy of the information provided to USEPA Region 5 shall be sent to the Ohio Environmental Protection Agency (Ohio EPA), who may then conduct a review and make recommendations to USEPA Region 5 to prevent and contain discharges from the Facility. Amendments to the Plan shall be made in accordance with the procedures listed in 40 CFR 112.4, if requested by the Regional Administrator.



3.0 AMENDMENT OF PLAN

PLAN AMENDMENTS

DPC shall amend this Plan within 6 months of a change in Facility design, construction, operation, or maintenance that materially affects the Facility's potential for the discharge of oil into or upon navigable waters of the United States or adjoining shorelines. Examples of such changes may include but are not limited to the addition of bulk storage containers, modifications to secondary containment, changes in location of fueling operations, and modifications to the Facility's storm water drainage system.

PLAN REVIEW

DPC shall review this Plan for accuracy and evaluate its effectiveness at a minimum frequency of once every 5 years. More frequent reviews of the Plan may be conducted following Facility changes or as determined necessary. Documentation of this review and evaluation will be made in **Appendix A**.

TECHNICAL AMENDMENTS

Because DPC operations at the Facility do not meet the requirements of a qualified facility that may self-certify its SPCC Plan in accordance with §112.6, DPC shall utilize a licensed Professional Engineer to review and certify technical amendments (e.g., amendments prepared under §112.5(a)) to this Plan. Non-technical amendments (e.g., phone numbers, contact names, etc.) do not require this certification.

4.0 QUALIFIED FACILITY PLAN REQUIREMENTS

This section does not apply because DPC operations at the Facility do not meet the requirements of a qualified facility that may self-certify its SPCC Plan. DPC shall utilize a licensed Professional Engineer to certify this entire Plan.



5.0 GENERAL REQUIREMENTS

5.1 PLAN REQUIREMENTS

5.1.1 Facility's Conformance to Requirements and Equivalent Environmental Protection

DPC's operations, Facility, and Plan are in conformance with the requirements of the SPCC regulations. DPC has identified additional facilities, procedures, methods, and/or equipment not yet fully operational and has committed to address these areas in a timely manner, as described in **Table 1**, but has not committed to final design solutions. Therefore, a technical amendment to the Plan shall be required within 6 months of implementing the changes identified in **Table 1**.

DPC has elected to provide equivalent environmental protection in lieu of certain requirements, as described in Section 6.3.5.

5.1.2 Physical Layout of Facility

Name: Cleveland Hopkins International Airport

Address: 5300 Riverside Drive

Cleveland, Ohio 44135

Telephone: (216) 265-6000

County: Cuyahoga

The Facility is located approximately 9 miles southwest of downtown Cleveland. The approximate 1,900 acres of airport property are situated in Cuyahoga County. Primary access to the Facility is via Ohio State Route 237.

The Facility Diagram, presented as **Figure 1 (a-e)**, identify the locations of regulated bulk storage containers owned by DPC, potential spill pathways, drainage infrastructure, spill response materials, and physical features of the Facility. The oil storage tanks owned but not operated by DPC that are shown on the Facility Diagram are not addressed further in this Plan. **Table 2** presents the oil storage tanks owned by DPC and the operators of those tanks.

5.1.3 Oil Storage Container Description

The type of oil in and the storage capacity of each regulated bulk storage container operated by DPC is presented in **Table 3**. Storage capacities are based on information collected during the Facility inspection and best available information provided by manufacturers and DPC personnel.

5.1.4 Discharge Prevention During Routine Oil Handling

DPC utilizes written operating procedures to prevent discharges during routine oil handling. These procedures are presented in **Appendix B**. Other discharge prevention measures are discussed in the following sections of the Plan:

- Section 5.5 Inspections, Tests, and Records
- Section 5.6 Personnel Training and Discharge Prevention Procedures



- Section 5.7 Security
- Section 5.8 Loading/Unloading Racks
- Section 5.9 Field-Constructed Aboveground Containers
- Section 5.10 State Statutes, Regulations, and Guidelines
- Section 6.2 Bulk Storage Containers
- Section 6.3 Facility Transfer Operations, Pumping, and Facility Process

5.1.5 Discharge and Drainage Control

Discharge and drainage control measures are discussed in the following sections of the Plan:

- Section 5.3 Containment and Diversionary Structures and Equipment
- Section 5.6 Personnel Training and Discharge Prevention Procedures
- Section 5.8 Loading/Unloading Racks
- Section 5.11 Oil-filled Operational Equipment
- Section 6.1 Facility Drainage
- Section 6.2 Bulk Storage Containers

5.1.6 Discharge Countermeasures

Discharge countermeasures are discussed in the following sections of the Plan:

- Section 5.1.9 Discharge Reporting Procedures
- Section 5.1.10 Discharge Response Procedures
- Section 5.3 Containment and Diversionary Structures and Equipment
- Section 5.5 Inspections, Tests, and Records
- Section 5.6 Personnel Training and Discharge Prevention Procedures

5.1.7 Disposal Methods of Recovered Materials

DPC shall characterize waste materials recovered from an oil spill or leak from seams, gaskets, piping, pumps, valves, rivets, bolts, or other sources as hazardous or non-hazardous waste and dispose or recycle the materials through appropriate waste disposal contractors and following applicable statutes and regulations.

5.1.8 Contact List

The contact list and phone numbers for the Spill Coordinator, National Response Center, response contractor, and appropriate Federal, State, and local agencies who must be contacted following a discharge event are presented in **Appendix C**. The responsibilities of the individuals identified on the contact list as well as other DPC employees, tenants, and response contractors involved in spill identification and response are presented in **Appendix D**.

5.1.9 Discharge Reporting Procedures

DPC's procedures and form to enable a person reporting a discharge are presented in **Appendix E**.



5.1.10 Discharge Response Procedures

DPC's procedures to be followed during a discharge event are presented in Appendix F.

SPILL FLOW PREDICTION

The total potential spill volume for each bulk storage container is the capacity of the container, presented in **Table 4**. This capacity represents the total volume of oil that could be spilled from the container as a result of tank rupture or catastrophic equipment failure and does not take into consideration secondary containment controls or routine equipment inspections. Facility and aviation industry experience suggest that bulk storage container and equipment failures with a reasonable potential to occur typically result in spill volumes significantly smaller than the catastrophic loss of the entire container contents.

Potential spill scenarios resulting from personnel or equipment failures are presented in **Table 4** and Section 5.3 for each bulk storage container. The scenarios include conservatively high estimates of rate of flow and potential spill volumes and represent the most likely discharge from the container or equipment. Predictions of the direction of spill flow from these scenarios and locations of spill containment materials are identified on the Facility Diagram in **Figures 1 and 2**.

CONTAINMENT AND DIVERSIONARY STRUCTURES AND EQUIPMENT

The methods for providing adequate general secondary containment for oil transfer operations with a reasonable potential to cause a discharge of oil to navigable waters as described in 40 CFR 112.1(b) are described in this section and **Table 4**.

5.1.11 Oil Transfer Activities

Container Filling from a Tanker Truck

During oil transfer from a tanker truck to the bulk storage containers listed below, the tanker operator is required to attend the operation while filling occurs. Fuel typically is transferred at a rate of 50 gallons per minute (gpm). In the event of an equipment failure during fuel transfer, due to the proximity of the operator to the equipment, fuel flow could be stopped by the operator within 15 seconds. This would result in a likely discharge volume of up to 13 gallons of oil from the operation and 13 gallons of oil from the transfer hose (assuming a 4-inch diameter and 20-foot length).

- 20,000 gallon Underground Storage Tank (UST) at Consolidated Maintenance Facility/Field (CMF-Field)
- 600 gallon ASTs at CMF/Vehicle Maintenance Building (CMF-VMB)
- 1,000 gallon AST outside CMF-VMB
- 2,000 gallon Aboveground Storage Tank (AST) at Electrical Vault (EV) No. 9
- 6,000 gallon USTs at Snow Barn

Manual Transfer and Pumps

Product transfer into bulk storage containers is performed manually for the bulk storage containers listed below. The likely discharge volume associated with small spills during manual filling is less than 1 gallon of oil.

• 230 gallon ASTs at CMF-VMB (Main Bay and Wash Bay)



- 400 gallon AST at CMF-VMB
- 55 gallon used oil drums at CMF-VMB and Wash Bay

Product transfer from the bulk storage containers listed below is conducted with manual crank pumps that transfer new oil from the drum at a rate of less than 1 gallon of oil per stroke. Manual crank pumps could be stopped immediately and result in a likely discharge of up to 1 gallon of oil from the operation and less than 1 gallon of oil from the transfer hose (assuming a 1-inch diameter and 5-foot length).

- 1,000 gallon (diesel) AST at CMF-VMB
- 55 gallon drums at CMF-VMB
- 55 gallon drums at ARFF
- 55 gallon drums at CMF-Field
- 55 gallon drums at Electrical Main Substation (MS) No. 2
- 55 gallon drum at Electrical Vault No. 9
- 55 gallon drums at Snow Barn

Fueling

Vehicle and equipment diesel fueling takes place at the 20,000 gallon UST at the CMF-Field. During fueling, DPC personnel are required to attend the operation while fueling occurs. Fuel is transferred at a rate of 20 gpm. In the event of an equipment failure during fuel transfer, due to the proximity of the operator to the equipment, fuel flow could be stopped by the operator within 15 seconds. This would result in a likely discharge volume of up to 5 gallons of oil from the operation and 2 gallons of oil from the transfer hose (assuming a 1-inch diameter and 50-foot length).

Vehicle and equipment diesel and gasoline fueling takes place at the Snow Barn fuel island. DPC personnel are required to attend the operation while fueling occurs. Fuel is transferred at a rate of 10 gpm. In the event of an equipment failure during fuel transfer, due to the proximity of the operator to the equipment, fuel flow could be stopped by the operator within 15 seconds. This would result in a likely discharge volume of up to 3 gallons of oil from the operation and less than 1 gallon of oil from the transfer hose (assuming a 1-inch diameter and 20-foot length).

Piping, Hoses, and Flexible Tubing

Piping, hoses, and/or flexible tubing is utilized for oil transfer for the bulk storage containers listed below. Piping, hoses, or tubing may drip or leak. The likely discharge volume and flow rate from a drip or leak is generally low and could result in a loss of up to 1 gallon of oil (volume rounded to the nearest gallon assuming a drip volume of 0.05 mL, flow rate of 1 drip per minute, and detection within 30 days as part of the monthly AST inspections as described in Section 6.2.6).

- 20,000 gallon UST at CMF-Field
- 1,000 gallon ASTs at CMF-VMB



- 600 gallon ASTs at CMF-VMB
- 400 gallon AST at CMF-VMB
- 230 gallon ASTs at CMF-VMB
- Emergency generators

A pressurized piping system is utilized for oil transfer from the bulk storage containers listed below. The compressor that pressurizes the system is turned off when the Facility is not operating. The pump rate on the piping system is 13 gpm. In the event the system is on and there is an equipment failure, oil flow could be stopped within 15 seconds. This could result in a spill of up to 3 gallons of oil from the operation and less 1 gallon of oil from the transfer hose, flexible tubing, and pressurized piping manifold (assuming a ½-inch diameter and 100-foot length).

- 600 gallon ASTs at CMF-VMB
- 55 gallon drums at CMF-VMB

Used Oil Transfer

Used oil transfer into the 1,000 gallon AST at the CMF-VMB is transferred using a pump with a flow rate of up to 159 gpm. In the event of an equipment failure during transfer, due to the proximity of the operator to the equipment, the pump could be stopped by the operator within 15 seconds. This would result in a likely discharge volume of up to 40 gallons of oil from the operation and 8 gallons of oil from the transfer pipe (assuming a 2-inch diameter and 50-foot length).

Used oil transfer from 55-gallon drums into the bulk storage containers listed below is transferred using pumps with a flow rate of up to 55 gpm. In the event of an equipment failure during transfer, due to the proximity of the operator to the equipment, transfer could be stopped by the operator within 15 seconds. This would result in a likely discharge volume of up to 14 gallons of oil from the operation and less than 1 gallon of oil from the transfer hose (assuming a 1-inch diameter and 20-foot length).

- 1,000 gallon AST at CMF-VMB
- 400 gallon AST at CMF-VMB
- 230 gallon ASTs at CMF-VMB

5.1.12 Portable/Mobile Storage Containers

DPC manages portable/mobile storage containers that fall into two different categories. The first category is a mobile refueler that fuels equipment and vehicles on the airfield and emergency generator tanks, as needed. The second category consists of towable containers, which include portable generators, various snow equipment, snow melters, and asphalt distributors. Generally, the location of these containers changes frequently during use. 55-gallon drums are also considered portable/mobile storage containers; however, these containers are typically maintained in one location during use. Oil transfers to and from 55-gallons drums are presented in Section 5.3.1. This section describes the general secondary containment for the mobile refueler and towable containers.



Mobile Refueler

The mobile refueler is filled using the 20,000-gallon UST at the Consolidated Maintenance Facility. Fueling from this bulk storage container is presented in Section 5.3.1.

The fuel flow rate from the mobile refueler is approximately 100 gpm. Personnel dispensing fuel are required to remain at the mobile refueler while fueling occurs. In the event of an equipment failure during fuel transfer, personnel are expected to either shut off the dispenser or engage the emergency shutoff switch, discontinuing the flow of fuel within 15 seconds. This would result in a likely discharge volume of up to 25 gallons of oil from the operation and 2 gallons of oil from the transfer hose (assuming a 1-inch hose and 50-foot length).

The mobile refueler is equipped with piping, hoses, and flexible tubing that may drip or leak. The volume and flow rate from a drip or leak is generally low and could result in a loss of up to 1 gallon of oil (volume rounded to the nearest gallon assuming a drip volume of 0.05 mL, flow rate of 1 drip per minute, and detection within 30 days as part of the mobile refueler inspections as described in Section 6.2.11).

Towable Equipment

The portable generators, snow brooms, snow melters, other various snow removal equipment and asphalt distributors are filled at the Snow Barn and CMF fuel islands, which are described in Section 5.3.1. This equipment may also be fueled on the airfield from the mobile refueler. Fueling operations for the mobile refueler is presented in the previous section.

The portable generators, snow brooms, and snow melters are equipped with suction piping, hoses, and flexible tubing that may drip or leak. The volume and flow rate from a drip or leak is generally low and could result in a loss of up to 1 gallon of oil (volume rounded to the nearest gallon assuming a drip volume of 0.05 mL, flow rate of 1 drip per minute, and detection within 30 days as part of the towable equipment inspections as described in Section 6.2.11).

5.1.13 Oil-filled Operational Equipment

Elevators

Elevators equipped with hydraulic reservoirs with oil storage capacities exceeding 55 gallons are operated indoors at the Facility. A small crack, gasket seal break, or corrosion, piping, or pinhole leak from the hydraulic oil reservoir may occur. The likely discharge volume associated with this equipment is generally low and could result in a loss of up to 1 gallon of oil (volume rounded to the nearest gallon assuming a drip volume of 0.05 mL, flow rate of 1 drip per minute, and detection within 30 days as part of the monthly elevator inspections). DPC personnel conduct monthly inspections of elevator hydraulic reservoirs, as presented in Appendix G, for the presence of drips, leaks, and/or standing oil on and around the equipment.

Transformers and Current Regulators

Transformers and current regulators with oil storage capacities exceeding 55 gallons are operated indoors and outdoors at the Facility. A small crack, gasket seal break, or corrosion, piping, or pinhole leak from the transformer or current regulator may occur. The likely discharge volume associated with this equipment is generally low and could result in a loss of up to 1 gallon of oil (volume rounded to the nearest gallon assuming a drip volume of 0.05 mL, flow rate of 1 drip per minute, and detection within 30 days as part of the monthly inspections). DPC personnel conduct monthly inspections of transformers and current regulators, as presented in **Appendix G**, for the presence of drips, leaks, and/or standing oil on and around the equipment.



A release from a transformer within a grassed area could be detected and cleaned up before leaving the grassed area around the transformer based on the grade and distance to the nearest storm drain and transformer inspection schedule. A release from a transformer at a paved or gravel area could be detected and cleaned up before reaching a storm water drain based on the high pedestrian and/or vehicle traffic in these areas, grade and distance to the nearest storm drain, and transformer inspection schedule.

Hydraulics

Two hydraulic lifts are decommissioned inside the Old Vehicle Maintenance Building. Two hydraulic lifts are aboveground at the CMF-VMB with some mobile columns. The lifts are equipped with piping and components that may drip or leak during use. The volume and flow rate from a drip or leak is generally low and could result in a loss of up to 1 gallon of oil (volume rounded to the nearest gallon assuming a drip volume of 0.05 mL, flow rate of 1 drip per minute, and detection within 30 days as part of the equipment inspections as described in Appendix G.

5.1.14 Oil Transfer Activities and Facility Drainage Features

Oil/Water Separators

Twelve oil/water separators (depicted on the **Figure 1**), were installed within the Facility drainage system as a Best Management Practice (BMP) intended to improve water quality from the Facility or help meet the requirements of the CLE National Pollutant Discharge Elimination System (NPDES) permit (refer to Sections 6.1.3 and 6.2.9). Several separators are maintained by DPC and utilized as part of the general secondary containment measures. The separators used for general secondary containment are described below.

Releases from oil transfer activities within these areas would typically be contained within the building and/or using absorbent materials prior to entering the separators, as they intended to be utilized as a last resort for containment.

The oil/water separators maintained by DPC are inspected, as presented in **Appendix G**, to detect and remove potentially accumulated oil to prevent potential system upsets that could cause a discharge. Additional information for each separator used as part of the general secondary containment measures at the Facility is presented in the following section.

Old Vehicle Maintenance Building

Maintenance and other oil transfer activities occurred in the past inside the Old Vehicle Maintenance Building. The floor drain system within the building is connected to an oil/water separator, which discharges to the sanitary sewer system. The separator has a total capacity of 1,500 gallons. The greatest volume of oil from a likely discharge occurring within this area is 48 gallons. Currently, there is no occupancy in this building.

Consolidated Maintenance Facility (CMF-VMB)

Maintenance and other oil transfer activities occur inside the Consolidated Maintenance Facility. The floor drain system within the building is connected to an oil/water separator, which discharges to the sanitary sewer system. The separator has a total capacity of 2,000 gallons and an oil storage capacity of approximately 206 gallons. The greatest volume of oil from a likely discharge occurring within this area is 2 gallons.



Drainage around/outside the Consolidated Maintenance Facility drains to an oil/water separator that discharges to the storm sewer system. The separator has a total capacity of 25,000 gallons and an oil storage capacity of approximately 20,000 gallons. The greatest volume of oil from a likely discharge occurring within this area is 28 gallons.

Concrete Containment

Concrete secondary containment structures were constructed around the bulk storage containers listed below. The potential oil transfer activities in these areas that could result in a discharge of oil include spills from filling emergency generator tanks, leaks or drips from flexible hoses/tubing, or leaks from transformers. The approximate oil storage capacity of each structure is presented below. Each structure is constructed to contain oil in the event of a spill or leak. The containment structures are inspected, as presented in Appendix G, to detect and remove accumulated oil on a regular basis to prevent potential system upsets that could cause a discharge.

- Emergency generator and transformers at Concourse C Gate C-1 4,309 gallons
- Emergency generator and transformers at Concourse C Gate C-9 1,436 gallons
- Emergency generator and transformers at Electrical Vault No. 6 1,077 gallons
- Emergency generator at Electrical Vault No. 7 6,732 gallons
- Transformers at Electrical MS No. 2 4,675 gallons (est.)
- Transformers at Electrical Vault No. 3 374 gallons

Dead End Sump

Two transformers are located at Electrical Vault No. 7, which is located indoors. Potential leaks from transformers in this area could drain to floor drains within the room. The floor drains are connected to a dead-end sump that has a total oil storage capacity of 800 gallons. The sump is inspected, as presented in Appendix G, to detect and remove accumulated oil after a discharge and on a regular basis to prevent potential system upsets that could cause a discharge.

EXPLANATION OF IMPRACTICABILITY

This section does not apply because installation of structures, and equipment in accordance with the general secondary containment requirements of \$112.7(c) and sized secondary containment requirements of \$112.8(c)(2) and \$112.8(c)(11) is practicable.

INSPECTIONS, TESTS, AND RECORDS

DPC performs inspections and/or tests on the following containers, equipment, or structures with the location of further discussion in the Plan:

- Oil-filled operational equipment Section 5.3.3
- Undiked areas Section 6.1.3
- Containment structures Section 6.2.3
- Bulk storage containers Section 6.2.6
- Container supports and foundations Section 6.2.6



- Liquid level sensing devices Section 6.2.8
- Oil/water separators Section 6.2.9
- Buried piping Section 6.3.1
- Aboveground valves, piping, and appurtenances Section 6.3.4

The inspection and tests are presented in **Appendix G**. Inspection records shall be maintained for a minimum of 3 years.

PERSONNEL TRAINING AND DISCHARGE PREVENTION PROCEDURES

5.1.15 Personnel Training

Personnel training is conducted at least once a year for oil-handling personnel in the following areas: operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control statutes and regulations; general Facility operations; and the contents of the Facility SPCC plan. This training is presented in **Appendix H**. Training records shall be maintained for a minimum of 3 years.

Additional briefings will be held any time there is a change in procedure or substantial additions to the existing procedures or equipment

5.1.16 Accountable Person

The Spill Coordinator, identified in **Appendix C**, is accountable for discharge prevention at the Facility and reports to Facility management.

5.1.17 Discharge Prevention Briefings

DPC staff participates in routine spill prevention briefings at least once a year to facilitate adequate understanding and effectiveness of this Plan. Such briefings highlight and describe known discharges of oil to navigable waters of the United States, malfunctioning components, and recently developed precautionary measures. Discharge prevention briefings for oil-handling personnel are described in **Appendix H**.

SECURITY

5.1.18 Facility Fencing

The airfield and terminal building are fully fenced and/or monitored in accordance with Transportation Security Administration (TSA) and FAA requirements. Access to the airfield and specific areas within the terminal building is restricted to authorized personnel. Alternatively, personnel needing access to restricted areas (i.e., vehicles delivering or removing oil products, contractors, etc.) are properly badged or escorted by DPC personnel while on site.

The bulk storage containers located outside the fenced airfield or restricted terminal building areas are listed below. The containers are located within locked rooms, buildings that are restricted to authorized personnel, or are equipped with locked access panels. Additionally, airport property is actively monitored on a 24-hour per day, 7-day per week schedule to prevent unauthorized access.

- Emergency generator at Electrical Vault No. 6
- Portable emergency generators at Five Points Garage or South Cargo Building
- Elevator reservoirs



• Transformers

5.1.19 Flow Valves

The mobile refueler and asphalt distributor tanks are equipped with master flow and drain valves that permit the direct outward flow of oil from the containers. The mobile refueler and asphalt distributors are located within the fenced airfield, which is an adequate security measure to ensure that flow valves remain in the closed position when in non-operating or non-standby mode.

5.1.20 Pump Starter Controls

Pump starter controls for the emergency generators and elevator reservoirs by nature of the operation, are always in standby or operating status, and cannot be locked in the "off" position except during maintenance. The pump starter controls are located within the fenced airfield or restricted terminal building area, locked rooms only accessible to authorized personnel, or have locked access panels.

Fuel pump starter controls for the 20,000 gallon UST fuel island at the Consolidated Maintenance Facility and 6,000 gallons Snow Barn fuel island are located within the fenced airfield area and equipped with an electronic system that activates the pump controls through the use of a key card, which is only provided to authorized personnel.

Pump starter controls for the oil distribution system and bulk storage containers listed below are located inside the CMF-VMB is located within the fenced airfield area, only accessible to authorized personnel, and locked when unattended.

- 600 gallon ASTs
- 1,000 gallon AST
- 400 gallon AST
- 230 gallon ASTs
- 55 gallon drums

The mobile refueler, snow brooms, snow melters, and asphalt distributors are located at the Consolidated Maintenance Facility, which is located within the fenced airfield area. Pump starter controls are also interlocked with the power controls for the equipment, which are only accessible to authorized personnel.

The 1,564-gallon transformers at Electrical MS No. 2 are located within a concrete secondary containment structure that is equipped with a pump to drain precipitation. The pump is located within the fenced airfield area and only accessible to authorized personnel.

5.1.21 Loading/Unloading Connections

This section does not apply because there are no loading/unloading connections of oil pipelines at the Facility. Fill ports are securely capped when not in service or when in standby service for an extended time.

5.1.22 Facility Lighting

Adequate interior or exterior lighting is present to operate safely, to discover leaks during inspections and operation, and to assist in the prevention of acts of vandalism is provided for each oil storage area at the Facility.



LOADING/UNLOADING RACKS

This section does not apply because there are no loading/unloading racks as defined in 40 CFR 112.2 operated by DPC at the Facility. Bulk storage containers are filled or emptied via direct connection using transfer hoses. General secondary containment for oil transfer operations is presented in Section 5.3.

FIELD-CONSTRUCTED ABOVEGROUND CONTAINERS

This section does not apply because there are no field-constructed, aboveground containers operated by DPC at the Facility.

STATE STATUTES, REGULATIONS, AND GUIDELINES

The bulk storage containers addressed in this Plan and the Facility are in conformance with applicable State statutes, regulations, and guidelines.

Ohio's State Emergency Response Commission (SERC) administrative statutes for determining reportable quantities and reporting releases of oil are presented in Chapter 25, Emergency Release Notification, Administrative Rules 3750-25-01, 3750-25-20 and 3750-25-25, effective 3 December 2021, as authorized by 3750.06 of the Ohio Revised Code. Refer to Appendix E for additional information on release reporting.

The State of Ohio promulgated state-specific regulations for fleet motor fuel dispensing facilities (Ohio Administrative Code (OAC) rule 1301:7-7-22) and USTs (OAC rule 1301:7-9) that are enforced by the State of Ohio Fire Marshal. The State of Ohio has not promulgated oil pollution prevention regulations. Refer to Appendix E for additional information on release reporting.

DPC has determined, pursuant to paragraph 40 CFR 112.20(a)(2), that because of its oil storage capacity and location, the Facility could not reasonably be expected to cause substantial harm to the environment by discharging oil into or upon navigable waters of the United States. Therefore, DPC has completed and maintains at the Facility, a Certification of the Applicability of Substantial Harm Criteria form, included in Section 7 of this Plan.

QUALIFIED OIL-FILLED OPERATIONAL EQUIPMENT

This section does not apply because the oil-filled operational equipment at CLE has adequate secondary containment to contain a reasonably expected discharge in accordance with the general secondary containment requirements of §112.7(c). A description of the general secondary containment for oil-filled operational equipment is described in Section 5.3.3 and **Table 4**.



6.0 **REQUIREMENTS FOR ONSHORE FACILITIES**

FACILITY DRAINAGE

6.1.1 Diked Area Valves

Concrete secondary containment structures were constructed around the bulk storage containers listed below and may accumulate precipitation. The structures are equipped with manually-operated, open-and-closed design drain valves or pumps.

- Emergency generator at Concourse C Gate C-1
- Emergency generator at Concourse C Gate C-9
- Transformers at Electrical MS No. 2
- Emergency generator at Electrical Vault No. 6
- Emergency generator at Electrical Vault No. 7
- Transformers at Electrical Vault No. 3

Other diked storage or handling areas are not equipped with valves or pumps or are located in areas that do not accumulate precipitation.

6.1.2 Diked Area Drainage

The bulk storage containers listed below are located in diked areas open to precipitation. Accumulated precipitation for these areas is inspected and removed in accordance with Section 6.2.3.

- Emergency generator at Concourse C Gate C-1
- Emergency generator at Concourse C Gate C-9
- Transformer at Electrical MS No. 1
- Transformers at Electrical MS No. 2
- Emergency generator at Electrical Vault No. 6
- Emergency generator at Electrical Vault No. 7
- Transformers at Electrical Vault No. 3

Secondary containment for other bulk storage containers are constructed or located such that precipitation cannot accumulate (i.e., indoor or completely enclosed).

6.1.3 Undiked Area Drainage

Twelve oil/water separators (depicted on the Facility Diagrams), were installed within the Facility drainage system as a BMP intended to improve water quality from the Facility or help meet the requirements of the CLE NPDES permit. Several separators are maintained by DPC and used in part to meet the general secondary containment requirements of §112.7(c) as discussed in Section 5.3.4 of this Plan.

Floor drains within Electrical Vault No. 7 drain to a dead-end sump.

The oil/water separators and sump are inspected, as presented in Appendix G, to detect and remove accumulated oil after a discharge and on a regular basis to prevent potential system upsets that could cause a discharge.

Storm water from Drainage Areas 001 and 002 and the Rental Car Facility drains into the North Detention Basin, which is equipped with two gate valves at the outlet of the basin. In the event a spill within these areas is not contained at its source, the gate valves are closed and allow temporary prevention of the spill from discharging at the Facility. Once water levels rise to the elevation of the overflow outlet, the spill will be released and the Spill Coordinator will implement additional control measures as necessary.

6.1.4 Diversion Systems

This section does not apply because drainage at the Facility is engineered to retain oil, as noted in Sections 5.3.4 and 6.1.3 of this Plan.

6.1.5 Treatment Units

This section does not apply because drainage waters are not treated in two or more continuous units.

BULK STORAGE CONTAINERS

6.1.6 Compatibility

Bulk storage containers are constructed of material compatible with the materials stored and conditions of storage such as pressure and temperature. Details of container construction material are presented in **Table 3**.

6.1.7 Secondary Containment

The methods for providing adequately sized secondary containment for bulk storage containers are presented in **Table 5**.

6.1.8 Drainage of Uncontaminated Precipitation

The bulk storage containers listed below are located in diked areas open to precipitation. The accumulated precipitation in these areas is inspected by an authorized DPC employee for the presence of oil. If no oil is visible, the accumulated precipitation is discharged from the containment area in compliance with the Facility's NPDES permit. If oil is visible, it shall be removed in compliance with Section 5.1.5. Records of these inspections and releases are maintained with the Master Copy of this Plan for a minimum of 3 years.

- Emergency generator at Concourse C Gate C-1
- Emergency generator at Concourse C Gate C-9
- Transformers at Electrical MS No. 1
- Transformers at Electrical MS No. 2
- Emergency generator at Electrical Vault No. 6
- Emergency generator at Electrical Vault No. 7
- Transformers at Electrical Vault No. 3

6.1.9 Underground Storage Tank Corrosion Protection

This section does not apply because there are no metallic underground storage tanks operated by DPC at the Facility.

6.1.10 Partially Buried Underground Storage Tanks

This section does not apply because there are no partially buried metallic underground storage tanks operated by DPC at the Facility.

6.1.11 Bulk Storage Container Testing and Inspection

Facility personnel test or inspect bulk storage containers for integrity on a regular schedule and whenever material repairs are made. Facility personnel follow the Steel Tank Institute (STI) *Standard for the Inspection of Aboveground Storage Tanks* (SP001, 6th Edition, September 2018) for inspection of welded, metal, shop-fabricated aboveground storage tanks and portable containers. This industry standard specifies the appropriate qualifications for personnel performing tests and inspections, the frequency and type of testing and inspections, which take into account tank size, configuration, and design. Integrity tests include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other systems of non-destructive testing. In addition, DPC personnel inspect the outside of containers on a monthly basis for signs of deterioration, discharges, or accumulation of oil inside diked areas. DPC also maintains comparison records and performs more comprehensive inspections for each tank on an annual basis.

Under STI SP001, the containers listed in **Table 5** are considered Category 1 containers (aboveground storage containers with spill control and a continuous release detection method) and therefore require periodic inspection. DPC personnel performing these inspections are knowledgeable of storage facility operations, characteristics of the liquids stored, the type of tank and its associated components including the pumping, piping and valve operations. DPC personnel perform monthly and annual inspections, as presented in **Appendix G** and in accordance with the provisions and checklists presented in STI SP001. The scope of the inspections and procedures is covered in the training provided to DPC employees involved in oil handling at the Facility. The inspections focus specifically on detecting changes in conditions or signs of product leakage from the container, piping system, and associated appurtenances.

Category 1 ASTs with storage capacities less than or equal to 5,000 gallons require a periodic visual inspection, which is conducted monthly and annually and recorded on the Monthly and Annual Inspection Checklists.

Category 1 containers with storage capacities greater than 5,000 gallons require a formal external inspection by a certified inspector every 20 years. The formal external inspections are performed to assess the containers' exterior condition and suitability for continued service without entry into the containers' interior.

In accordance with inspection procedures outlined in **Appendix G** and STI SP001, nonconformance items important to the integrity of the tank shall require an inspection by a certified tank inspector to assess corrective actions.

Testing and inspections for the emergency generator AST at Electrical Vault No. 9 is described in **Appendix G**. Inspection records shall be for a minimum of 3 years.

6.1.12 Internal Heating Coil Leakage Control

This section does not apply because there are no internal heating coils used in bulk storage containers operated by DPC at the Facility.

6.1.13 Discharge Avoidance Systems

Liquid level monitoring is the selected means for discharge avoidance. The use of liquid level gauges or direct signal communication system for each bulk storage container is presented on Table 5. Bulk storage container filling procedures are presented in **Appendix B**. Testing of the liquid level sensing devices is presented in **Appendix G**.

6.1.14 Effluent Treatment Facilities

Oil/water separators were installed within the Facility drainage system as BMPs to improve water quality from the Facility and to meet the requirements of the CLE NPDES permit. The separators are inspected as presented in **Appendix G** to detect and remove accumulated oil to prevent potential system upsets that could cause a discharge.

6.1.15 Accumulated Discharges

Visible discharges that result in a loss of oil from bulk storage containers, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts, shall be promptly corrected. Accumulations of oil shall be removed in compliance with Section 5.1.5.

6.1.16 Portable and Mobile Storage Containers

The 55-gallon drums, mobile refueler, portable generators, snow brooms, snow melters, and asphalt distributors are the portable and mobile storage containers operated by DPC at the Facility. Sized secondary containment is required for the 55-gallon drums and for the portable generators, snow brooms, snow melters, and asphalt distributors when in stationary or unattended mode. Sized secondary containment does not apply to mobile refuelers. The methods for providing adequately sized secondary containment for portable/mobile storage containers are presented in **Table 5**.

FACILITY TRANSFER OPERATIONS, PUMPING, AND FACILITY PROCESS

6.1.17 Corrosion Protection

This section does not apply because there are no metallic underground piping utilized at the Facility.

6.1.18 Terminal Connections

This section does not apply because there are no terminal connections at transfer points for piping at the Facility.

6.1.19 Pipe Supports

Pipe supports, designed by other, for bulk storage containers do not appear to show signs of abrasion or corrosion and appear to allow for expansion and contraction.

6.1.20 Inspections

Aboveground valves, piping, and appurtenances are regularly inspected following the procedures presented in **Appendix G**.

6.1.21 Warnings

Aboveground piping, hoses, flexible tubing, and other oil transfer operations are located in areas inaccessible to direct contact by vehicles as presented in the following section. This approach provides environmental protection equivalent to the warning requirements of 40 CFR 112.8(d)(5) since it provides an appropriate and effective means of preventing damage to aboveground piping and other oil transfer operations.

- Aboveground piping for the following bulk storage containers is located behind bollards or guardrails:
 - 1,000 gallon ASTs at CMF-VMB
 - Emergency generator at Concourse B
 - Emergency generator at Concourse C Gate C-1
 - Emergency generator at Concourse C Gate C-9
 - Emergency generator at Electrical MS No. 2
 - Emergency generator at Electrical Vault No. 6
 - Emergency generator at Electrical Vault No. 7
 - Emergency generator at Electrical Vault No. 9
 - Emergency generator at Electrical Vault No. 10
- Aboveground piping for the following bulk storage containers is located inside their respective building:
 - o 600 gallon ASTs at CMF-VMB
 - 400 gallon AST at CMF-VMB
 - o 230 gallon ASTs at CMF-VMB
 - Emergency generator at Concourse C Gate C-21
 - Emergency generator at Concourse D
 - Elevator reservoirs
- Hoses and flexible tubing for the emergency generators are located within the generator enclosure.
- Transfer hoses are returned to the dispenser or rolled up when not in use.

7.0 REGULATORY APPENDICES

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA

Facility Name: Cleveland Hopkins International Airport

Facility Address: 5300 Riverside Drive

Cleveland, Ohio 44135

1. Does the Facility transfer oil over water to or from vessels and does the Facility have a total oil storage capacity greater than or equal to 42,000 gallons? Yes $\underline{No} X$

2. Does the Facility have a total oil storage capacity greater than or equal to 1 million gallons and does the Facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area? Yes <u>No X</u>

3. Does the Facility have a total oil storage capacity greater than or equal to 1 million gallons and is the Facility located at a distance (as calculated using the appropriate formula in Attachment C–III to this appendix or a comparable formula¹) such that a discharge from the Facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to this part, section 13, for availability) and the applicable Area Contingency Plan. Yes <u>No X</u>

4. Does the Facility have a total oil storage capacity greater than or equal to 1 million gallons and is the Facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula¹) such that a discharge from the Facility would shut down a public drinking water intake²?

Yes ____ No _X__

5. Does the Facility have a total oil storage capacity greater than or equal to 1 million gallons and has the Facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes ____ No _X__

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature:

Name:_____

Title:

Date:

¹If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

²For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

Table 1: Schedule of Conformance

Location	SPCC Regulated Activity Not Fully Operational	Regulatory Requirement	Recommended Corrective Action	Implementation Date
	The 2,000-gallon ConVault® AST was acquired from the FAA, is half-full, and is not currently in use.			
Outside Storage adjacent to Old Vehicle Maintenance Building	Former CMF-Field 12,000-gallon double walled (DW) AST and dispenser nozzles and hoses on ground under AST.		 Post conspicuous signs on the tank stating that it is "permanently closed" and noting the date of closure or Put the tank into use in accordance with local, State and Federal regulations, and incorporate the tank 	
	Former EV-14 DW AST (small)	40 CFR 112.1 – (The SPCC rules apply to) Any container that is used for standby storage, for seasonal storage, or for temporary storage, or not otherwise "permanently closed" as defined in §112.2.	into the SPCC plan.	December 2022
	Vehicle Gate Controllers			
Old Vehicle Maintenance Building	200-gallon single walled (hydraulic lifts) (x2)		Permanently close the tank by: Post conspicuous signs on the tank stating that it is "permanently closed" and noting the date of closure	
Elevator Rooms	Oil from hydraulic reservoirs inside elevator rooms 15, 16, and 39 could drain to nearby floor drains.	40 CFR 112.7(c) - Provide appropriate containment and/or diversionary structures or equipment to prevent a discharge.	Plug the floor drains inside the elevator reservoir rooms.	December 2022



Location	SPCC Regulated Activity Not Fully Operational	Regulatory Requirement	Recommended Corrective Action	Implementation Date	
Electrical Vault No. 6	Pump starter controls for the emergency generator are not locked and are located in an area where someone could access the controls.	40 CFR 112.7(g) - Describe in your Plan how you prevent unauthorized access to starter controls on oil pumps to prevent acts of vandalism.	Lock the access panel to the generator to prevent unauthorized access to pump starter controls.	December 2022	
Old Vehicle Maintenance Building	The small red tank outside at the outdoor storage area is constructed of single-walled steel and has no means of sized secondary containment.		Removed the tank from the Facility.		
Electrical Vault No. 9	The drum inside the building was not provided with sized secondary containment. Additionally, a discharge of oil could drain to floor drains within the building.	40 CFR 112.8(c)(2) - Construct all bulk storage tank installations so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation.	Remove the drum from the building or provide sized secondary containment capable of holding a minimum of 55 gallons of oil.	December 2022	
ARFF	The drum inside the building was not provided with sized secondary containment. Additionally, a discharge of oil could drain to floor drains within the building.		Provide sized secondary containment capable of holding a minimum of 55 gallons of oil.		
Five Points Garage	The portable generators are not provided with sized secondary containment when in a stationary or unattended mode.	40 CFR 112.8(c)(11) - Position or locate mobile or portable oil storage containers to prevent a discharge as described in §112.1(b). Except for mobile refuelers,	Fuel should be removed and generator moved for disposal.		
Electrical Vault No. 10	The electronic level monitoring system for the 2,000-gallon emergency generator AST is not operable.	you must furnish a secondary means of containment, such as a dike or catchment basin, sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation.	Repair the electronic monitoring system or install a fuel gauge so that tank liquid level can be identified by the operator during fill operations.		



Location	Contents	Storage Capacity (gallons)	Container Type	Operator
Avis Rental Car Facility	New Oil	500	AST	Avis Rental Car
Avis Rental Car Facility	Used Oil	500	AST	Avis Rental Car
Budget Rental Car Facility	New Oil	500	AST	Budget Rental Car
Budget Rental Car Facility	New Oil	280	AST	Budget Rental Car
Budget Rental Car Facility	New Oil	120	AST	Budget Rental Car
Budget Rental Car Facility	Used Oil	500	AST	Budget Rental Car
Dollar Rental Car Facility	New Oil	240	AST	Dollar Rental Car
Dollar Rental Car Facility	Used Oil	280	AST	Dollar Rental Car
Enterprise Rental Car Facility	New Oil	280	AST	Enterprise Rental Car
Enterprise Rental Car Facility	New Oil	280	AST	Enterprise Rental Car
Enterprise Rental Car Facility	Used Oil	280	AST	Enterprise Rental Car
FAA Control Tower	Diesel	1,000	AST	FAA
FAA ALS	Diesel	1,000	AST	FAA
FAA ASR-9	Diesel	1,000	AST	FAA
FAA - West Hangar Rd.	Diesel	2,000	AST	FAA
Hertz Rental Car Facility	New Oil	1,000	AST	Hertz Rental Car
Hertz Rental Car Facility	Used Oil	1,000	AST	Hertz Rental Car
Menzies Fuel Facility	Jet Fuel	632,000	AST	Menzies Fuel Facility
Menzies Fuel Facility	Jet Fuel	632,000	AST	Menzies Fuel Facility
Menzies Fuel Facility	Used Oil	1,000	AST	Menzies Fuel Facility
Menzies Into-Plane	Motor Oil	500	AST	Menzies Into-Plane
Menzies Into-Plane	Oil	500	AST	Menzies Into-Plane
Menzies Into-Plane	Used Oil	150	AST	Menzies Into-Plane
National Alamo Rental Car Facility	New Oil	500	AST	National Alamo Rental Car
National Alamo Rental Car Facility	Used Oil	500	AST	National Alamo Rental Car
National Weather Service	Diesel	1,000	AST	National Weather Service

Notes: An underground hydrant system for aircraft fueling is located around the terminal building at CLE. The hydrant system is owned by DPC but operated by tenants at the Facility.

¹ These containers are not addressed further in this Plan because they are not operated by DPC



TABLE 3: REGULATED OIL STORAGE CONTAINERS OWNED AND OPERATED BY DPC

Airport Building No.	Location	Contents	Storage Capacity (gallons)	Container Type	Construction	Emissions Unit ID (if applicable)
		Aboveground S	torage Tanks			
402	CMF-VMB – Bulk Storage Room	New Oil	600	AST	Double-walled steel	
402	CMF-VMB – Bulk Storage Room	Transmission Fluid	600	AST	Double-walled steel	
402	CMF-VMB – Bulk Storage Room	Used Oil	400	AST	Double-walled steel	
402	CMF-VMB – Main Bay	Used Oil	1,000	AST	Double-walled steel	
402	CMF-VMB – Main Bay	Used Oil	230	AST	Double-walled steel	
402	CMF-VMB – Wash Bay	Used Oil	230	AST	Double-walled steel	
		Underground St	orage Tanks ¹			
402	CMF-SRE	Diesel	20,000	UST	Double-walled steel	
303	Snow Barn	Diesel	6,000 x 2	UST	N/A	
303	Snow Barn	Gasoline	6,000	UST	N/A	
		Emergency Generate	or Fuel Tanks			
100B	Concourse B – Gates B6/B8	Diesel	340	Belly tank	Double-walled steel	B009
100C	Concourse C – Gate C7/C9	Diesel	950	Belly tank	Double-walled steel	B010
100A	Electrical Vault No. 2 (inside)	Diesel	SIZE?	Day tank	Double-walled steel	B011
100A	Electrical Vault No. 2 (outside)	Diesel	1,000	AST	Double-walled steel	B011
401	Electrical Vault No. 10 (inside)	Diesel	200	Day tank	Single-walled steel with steel containment	B012
401	Electrical Vault No. 10 (outside)	Diesel	2,000	AST	Double-walled steel	B012
N/A	Old VMB Mezzanine Level Main Bay (inside)	Diesel	55	Day tank	Single-walled steel	B013
N/A	Old VMB Mezzanine Level Main Bay (outside)	Diesel	1,000	AST	Double-walled	B013
100C	Concourse C – Gate C21	Diesel	275	Belly tank	Double-walled steel	B014
100D	Concourse D	Diesel	250	AST	Double-walled steel	B015
	EV-6 (next to Octagon Bldg)	Diesel	1250	AST	Double-walled steel	B016



Airport Building No.	Location	Contents	Storage Capacity (gallons)	Container Type	Construction	Emissions Unit ID (if applicable)
202	Electrical Vault No. 9 (inside)	Diesel	115	Day tank	Single-walled steel with steel containment	B019
202	Electrical Vault No. 9 (outside)	Diesel	2,000	AST	Double-walled	B019
100C	Concourse C – Gate C1	Diesel	2,500	Belly tank	Double-walled steel	B020
100	Electrical Vault No. 7 – Old ATCT (Moat)	Diesel	3,850	Belly tank	Double-walled steel	B021
402	CMF Emergency Generator	Diesel		AST	Double-walled	B024
103	Electrical MS No. 1/ Electrical Vault 0					
103	Electrical MS No. 1/ Electrical Vault 0					
223	Electrical MS No. 2 – Moat (outside)	Diesel	1,250	AST	Double-walled steel	
223	Electrical MS No. 2 – Moat (inside)	Diesel	250	Day tank	Double-walled steel	
		Mobile and Portab	le Containers			
204	Five Points Garage	Diesel	100 x 2	Generator	Single-walled steel	B023
201	ARFF	New Oil	55	Drum	Single-walled steel	
402	CMF/SRE	New Oil	55	Drum	Single-walled steel	
402	CMF/SRE or CMF-VMB	Diesel	3,000	Mobile refueler (2)	Single-walled steel	
402	CMF/SRE or CMF-VMB	Diesel	125 x 2	Snow blowers (13)	Single-walled steel	
402	CMF/SRE or CMF-VMB	Diesel	75 x 2	MPs (17)	Single-walled steel	
402	CMF/SRE or CMF-VMB	Diesel	125 x 2	Brooms (4)	Single-walled steel	
402	CMF/SRE or CMF-VMB	Diesel	70 x 2	New Plows (5)	Single-walled steel	
402	CMF/SRE or CMF-VMB	Diesel	125	Volvo Plows (3)	Single-walled steel	
402	CMF/SRE or CMF-VMB	Diesel	70	Other Plows (4)	Single-walled steel	
402	CMF/SRE or CMF-VMB	Diesel	100	Combo Trucks (6)	Single-walled steel	
402	CMF/SRE or CMF-VMB	Diesel	80	Tankers (4)	Single-walled steel	
402	CMF/SRE or CMF-VMB	Diesel	100	Sand Trucks (4)	Single-walled steel	
402	CMF/SRE or CMF-VMB	Diesel	126	744 Loaders (8)	Single-walled steel	
402	CMF/SRE or CMF-VMB	Diesel	95	624 Loaders (3)	Single-walled steel	
402	CMF/SRE or CMF-VMB	Diesel	1,600	Snow Melter (2)	Double-walled steel	P001-P002



Airport Building No.	Location	Contents	Storage Capacity (gallons)	Container Type	Construction	Emissions Unit ID (if applicable)
402	CMF/SRE or CMF-VMB	Diesel	800	Snow Melter (4)	Double-walled steel	P003-P006
402	CMF/SRE or CMF-VMB	Asphalt tack	132 X 2	Asphalt distributor	Double-walled steel	
223	Electrical MS No. 2 – Moat (inside)	New Oil	55	Drum	Single-walled steel	
202	Electrical Vault No. 9 – Inside	New Oil	55	Drum	Single-walled steel	
303	Snow Barn	New Oil	55	Drum	Single-walled steel	
		Transformers a	and Current Regulators			
104	BP Fuel Farm	Dielectric Oil	130	Transformer	Single-walled steel	
203	Parker Hannifan	Dielectric Oil	195 (est.)	Transformer	Single-walled steel	
205	Central Receiving	Dielectric Oil	270	Transformer	Single-walled steel	
206	Bomb Squad	Dielectric Oil	150	Transformer	Single-walled steel	
2074	SkyChef/Bradford	Dielectric Oil	195	Transformer	Single-walled steel	
208	ServisAir/Global Ground Service	Dielectric Oil	189	Transformer	Single-walled steel	
214	Future DPC Training Center	Dielectric Oil	195	Transformer	Single-walled steel	
	Cargo Road Transformer	Dielectric Oil	93	Transformer	Single-walled steel	
100C	Concourse C – Gate C-1	Dielectric Oil	430 x 2	Transformer	Single-walled steel	
100C	Concourse C – Upper Drive	Dielectric Oil	212	Transformer	Single-walled steel	
402	Consolidated Maintenance Facility	Dielectric Oil	195	Transformer	Single-walled steel	
101/102	Constant Aviation – West	Dielectric Oil	414	Transformer	Single-walled steel	
101/102	Constant Aviation – East	Dielectric Oil	414	Transformer	Single-walled steel	
	Corporate Wings Hangar, M.A. Hanna, BP	Dielectric Oil	318	Transformer	Single-walled steel	
103	Electrical Vault No. 0	Dielectric Oil	85 x 2	Current regulator	Single-walled steel	
	Electrical Vault No. 1	Dielectric Oil	166	Transformer	Single-walled steel	
100A	Electrical Vault No. 2	Dielectric Oil	Amount x 2	Transformer	Single-walled steel	
100A	Electrical Vault No. 2 (Spare)	Dielectric Oil	269	Transformer	Single-walled steel	
	Electrical Vault No. 3	Dielectric Oil	430 x 2	Transformer	Single-walled steel	
	Electrical Vault No. 5 (Regulator)	Dielectric Oil	85	Transformer	Single-walled steel	



Airport Building No.	Location	Contents	Storage Capacity (gallons)	Container Type	Construction	Emissions Unit ID (if applicable)
	Electrical Vault No. 5 (Spare)	Dielectric Oil	78	Transformer	Single-walled steel	
	Electrical Vault No. 6	Dielectric Oil	430 x 2	Transformer	Single-walled steel	
	Electrical Vault No. 7	Dielectric Oil	298 x 2	Transformer	Single-walled steel	
202	Electrical Vault No. 9	Dielectric Oil	66	Current regulator	Single-walled steel	
202	Electrical Vault No. 9	Dielectric Oil	60 x 2	Current regulator	Single-walled steel	
202	Electrical Vault No. 9	Dielectric Oil	85 x 2	Current regulator	Single-walled steel	
202	Electrical Vault No. 9	Dielectric Oil	70	Current regulator	Single-walled steel	
401	Electrical Vault No. 10	Dielectric Oil	414 (est.)	Transformer	Single-walled steel	
221	Federal Express	Dielectric Oil	499	Transformer	Single-walled steel	
	Electrical Vault No. 5 (Federal Express Spare)	Dielectric Oil	160	Transformer	Single-walled steel	
222	Glycol Recovery Building	Dielectric Oil	166	Transformer	Single-walled steel	
211	JETS FBO	Dielectric Oil	180	Transformer	Single-walled steel	
209	Menzies Bulk Fuel Farm	Dielectric Oil	413	Transformer	Single-walled steel	
103	MS-1	Dielectric Oil	2,286 x 2	Transformer	Single-walled steel	
223	MS-2	Dielectric Oil	5,553 x 2	Transformer	Single-walled steel	
223	MS-2	Dielectric Oil	1,564 x 2	Transformer	Single-walled steel	
223	MS-2	Dielectric Oil	147 x 2	Transformer	Single-walled steel	
100A	Spare Transformer (stored near EV- 2)	Dielectric Oil	269	Transformer	Single-walled steel	
212	United Cargo Building	Dielectric Oil	190	Transformer	Single-walled steel	
213	United Hangar	Dielectric Oil	370	Transformer	Single-walled steel	
234	United Hangar – Freight	Dielectric Oil	145	Transformer	Single-walled steel	
219	United Hangar – Vehicle Maintenance	Dielectric Oil	205	Transformer	Single-walled steel	
		Elevat	tor Reservoirs			
	E1 – Terminal Building – Bridge/Baggage (City #6122)	Hydraulic Oil	210	Elevator reservoir	Single-walled steel	
	E2 – Terminal Building – Bridge/Baggage (City #6123)	Hydraulic Oil	210	Elevator reservoir	Single-walled steel	
	E3 – Terminal Building – Bridge/RTA (north) (City #6095)	Hydraulic Oil	210	Elevator reservoir	Single-walled steel	
	E4 – Terminal Building – Bridge/RTA (south) (City #6096)	Hydraulic Oil	210	Elevator reservoir	Single-walled steel	



Airport Building No.	Location	Contents	Storage Capacity (gallons)	Container Type	Construction	Emissions Unit ID (if applicable)
	E17 – FSS Building (City #4688)	Hydraulic Oil	135	Elevator reservoir	Single-walled steel	
	E20 – Terminal Building – Ticketing/Baggage (south) (City #4751)	Hydraulic Oil	129	Elevator reservoir	Single-walled steel	
	E21– Terminal Building – Ticketing/Baggage (north) (City #6461)	Hydraulic Oil	210	Elevator reservoir	Single-walled steel	
	E22 – Terminal Building – Baggage Makeup/South Ticketing (City #4754)	Hydraulic Oil	129	Elevator reservoir	Single-walled steel	
	E25A – Building Maintenance Freight (City #5917)	Hydraulic Oil	135	Elevator reservoir	Single-walled steel	
	E25B – Commissary (City #5179)					
	E26 – North Moat/Compactor (City #4799)	Hydraulic Oil	135	Elevator reservoir	Single-walled steel	
	E27 – Concourse A – Customs(City #4800)	Hydraulic Oil	129	Elevator reservoir	Single-walled steel	
	E28 – Concourse A – End (City #4801)	Hydraulic Oil	129	Elevator reservoir	Single-walled steel	
	E29 – Concourse C – Rotunda (City #1214)	Hydraulic Oil	125	Elevator reservoir	Single-walled steel	
	E30 – Concourse C – President's Club (City #6085)	Hydraulic Oil	144	Elevator reservoir	Single-walled steel	
	E31 – Concourse B – Gate B-1 (City #4986)	Hydraulic Oil	92	Elevator reservoir	Single-walled steel	
	E32 – Concourse B – City Operations (City #4987)	Hydraulic Oil	135	Elevator reservoir	Single-walled steel	
	E33 – Concourse C – Node to tunnel (City #6201)	Hydraulic Oil	210	Elevator reservoir	Single-walled steel	
	E34 – Concourse C – Node to tunnel (City #6202)	Hydraulic Oil	210	Elevator reservoir	Single-walled steel	
	E35 – Concourse D – Node Freight (City #6198)	Hydraulic Oil	210	Elevator reservoir	Single-walled steel	
	E36 – Concourse D – Node Passengers (City #6203)	Hydraulic Oil	210	Elevator reservoir	Single-walled steel	
	E37 – Concourse D – Compactor (City #6199)	Hydraulic Oil	210	Elevator reservoir	Single-walled steel	
	E38 – Concourse D, Tower (City #6200)	Hydraulic Oil	210	Elevator reservoir	Single-walled steel	
	E39 – Orange Lot to Bridge (7167)	Hydraulic Oil	116	Elevator reservoir	Single-walled steel	

¹The underground storage tanks are registered under the State of BUSTR requirements and are presented on the Facility Diagram. Oil transfer operations associated with these tanks are presented in Table 4.



Location	Container Type	Contents	Storage Capacity (gallons)	Potential Spill Scenario	Estimated Flow Rate (gpm)	Time Required to Stop Pump (seconds)	Estimated Volume of Oil from Pumping (gallons)	Estimated Volume of Oil in Piping (gallons)	Total Spill Volume ¹ (gallons)	General Secondary Containment ¹	
				Aboveground	Storage Tanks						
		New Oil	600	Spill during filling from tanker truck	50 (est.)	15	13	16	29	Absorbent boom, pads, and/or cla Building VMB oil/water separator	
CMF-VMB – Bulk Storage Room	AST			Pressurized dispenser malfunction	13	15	3	1	4		
				Leak from piping or flexible tubing (off mode)	< 1 drip per minute	N/A	N/A	N/A	1		
		Transmission Fluid	600	Spill during filling from tanker truck	50 (est.)	15	13	16	29		
CMF-VMB –Bulk Storage Room	AST			Pressurized dispenser malfunction	13	15	3	1	4	Absorbent boom, pads, and/or cl Building VMB oil/water separator	
				Leak from piping or flexible tubing (off mode)	< 1 drip per minute	N/A	N/A	N/A	1		
		Used Oil	1,000 -	Spill during manual filling of tank	Manual	N/A	N/A	N/A	< 1	Spill bucket Absorbent boom, pads, and/or cla	
CMF-VMB – Main Bay	AST			Spill during filling of tank using pump	159	15	40	8	48	Absorbent boom, pads, and/or cla Building VMB oil/water separator	
	AST			Spill during unloading contents into tanker truck	20 (est.)	15	5	13	18	Absorbent boom, pads, and/or clay	
				Leak from piping	< 1 drip per minute	N/A	N/A	N/A	1		
			250	Spill during manual filling of tank	Manual	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or c Steel containment structure	
CMF-VMB – Main Bay	AST	Used Oil		Spill during filling of tank using pump	55 (est.)	15	14	< 1	15		
				Spill during unloading contents into tanker truck	20 (est.)	15	5	13	18		
			400	Spill during manual filling of tank	Manual	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or o Building VMB oil/water separator	
CMF-VMB – Bulk Storage Room	AST	Used Oil		Spill during filling of tank using pump	55 (est.)	15	14	< 1	15		
				Leak from piping	< 1 drip per minute	N/A	N/A	N/A	1		
		Used Oil	250	Spill during manual filling of tank	Manual	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or cl	
CMF-VMB – Wash Bay	AST			Spill during filling of tank using pump	55 (est.)	15	14	< 1	15	Building VMB oil/water separator	

TABLE 4: Potential Discharge Volume and General Secondary Containment Summary



SPCC Plan for the Department of Port Control Cleveland Hopkins International Airport

Location	Container Type	Contents	Storage Capacity (gallons)	Potential Spill Scenario	Estimated Flow Rate (gpm)	Time Required to Stop Pump (seconds)	Estimated Volume of Oil from Pumping (gallons)	Estimated Volume of Oil in Piping (gallons)	Spill	General Secondary Containment ¹
				Leak from piping	< 1 drip per minute	N/A	N/A	N/A	1	



TABLE 4: Potential Discharge	Volume and General	I Secondary Containment Summary	,
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Location	Container Type	Contents	Storage Capacity (gallons)	Potential Spill Scenario	Estimated Flow Rate (gpm)	Time Required to Stop Pump (seconds)	Estimated Volume of Oil from Pumping (gallons)	Estimated Volume of Oil in Piping (gallons)	Total Spill Volume ¹ (gallons)	General Secondary Containment ¹
				Spill during manual filling of tank	Manual	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
CMF-VMB – Weld Shop AST	Used Oil	230	Spill during filling of tank using pump	55 (est.)	15	14	< 1	15	Building VMB oil/water separator	
				Leak from piping	< 1 drip per minute	N/A	N/A	N/A	1	
	- -	1	4	Underground St	orage Tanks ²			<u> </u>		
CMF – Field	UST	Diesel	20,000	Spill during filling of tank or use of pump]					
				Emergency Gener	ator Fuel Tanks					
				Spill during filling from mobile refueler	100	15	25	2	27	Generator enclosure
Concourse B – Gates B6/B8	Belly tank	Diesel	340	Leak from piping or flexible tubing	< 1 drip per minute	N/A	N/A	N/A	1	Absorbent boom, pads, and/or clay
Concourse C – Gate C1	Bolly topk	Discol	2,500	Spill during filling from mobile refueler	100	15	25	2	27	Generator enclosure Concrete containment
Concourse C – Gale C I	Belly tank	Diesel	2,500	Leak from piping or flexible tubing	< 1 drip per minute	N/A	N/A	N/A	1	Absorbent boom, pads, and/or clay
Concourse C – Gate C9	Belly tank	Diesel	950	Spill during filling from mobile refueler	100	15	25	2	27	Generator enclosure Concrete containment
				Leak from piping or flexible tubing	< 1 drip per minute	N/A	N/A	N/A	1	Absorbent boom, pads, and/or clay
				Spill during filling from mobile refueler	100	15	25	2	27	Spill bucket (2) Absorbent boom, pads, and/or clay
Concourse C – Gate C21	Belly tank	Diesel	550	Leak from piping or flexible tubing	< 1 drip per minute	N/A	N/A	N/A	1	Generator room Absorbent boom, pads, and/or clay
Concourse D	ACT	refueler	2	27	Generator room					
Concourse D	AST	Diesel	250	Leak from piping or flexible tubing	< 1 drip per minute	N/A	N/A	N/A	1	Absorbent boom, pads, and/or clay



TABLE 4: Potential Discharge	Volume and General	Secondary Containme	ent Summary
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Location	Container Type	Contents	Storage Capacity (gallons)	Potential Spill Scenario	Estimated Flow Rate (gpm)	Time Required to Stop Pump (seconds)	Estimated Volume of Oil from Pumping (gallons)	Estimated Volume of Oil in Piping (gallons)	Total Spill Volume ¹ (gallons)	General Secondary Containment ¹
	ACT	Discol	4 050	Spill during filling from mobile refueler	100	15	25	2	27	Spill bucket Absorbent boom, pads, and/or clay
Electrical MS No. 2 – Moat (outside)	AST	Diesel	1,250	Leak from piping	< 1 drip per minute	N/A	N/A	N/A	1	Absorbent boom, pads, and/or clay
Electrical MS No. 2 – Moat (inside)	Day tank	Diesel	250	Leak from piping or flexible tubing	< 1 drip per minute	N/A	N/A	N/A	1	Generator room Absorbent boom, pads, and/or clay
Electrical Vault No. 7 – Air Traffic Control				Spill during filling from mobile refueler	100	15	25	2	27	Generator enclosure
Tower	Belly tank	Diesel	3,850	Leak from piping or flexible tubing	< 1 drip per minute	N/A	N/A	N/A	1	Concrete containment Absorbent boom, pads, and/or clay
Electrical Vault No. 9 (outside)	AST	Diesel	2,000	Spill during filling from tanker truck	50 (est.)	15	13	16	29	Absorbent boom, pads, and/or clay
Electrical Vault No. 9 (inside)	Day tank	Diesel	115	Leak from piping or flexible tubing	< 1 drip per minute	N/A	N/A	N/A	1	Generator room Absorbent boom, pads, and/or clay
Electrical Vault No. 10 (outside)	AST	Diesel	2,000	Spill during filling from mobile refueler	100	15	25	2	27	Spill bucket
	A01	Diesei	2,000	Leak from piping	< 1 drip per minute	N/A	N/A	N/A	1	Absorbent boom, pads, and/or clay
Electrical Vault No. 10 (inside)	Day tank	Diesel	200	Leak from piping or flexible tubing	< 1 drip per minute	N/A	N/A	N/A	1	Generator room Absorbent boom, pads, and/or clay
	AST Die:			Spill during filling from tanker truck	50 (est.)	15	13	16	29	
CMF/SRE – Emergency Generator AS		Diesel	1,000	Leak from piping	< 1 drip per minute	N/A	N/A	N/A	1	Absorbent boom, pads, and/or clay
				Spill during manual pumping from tank	< 1 gallon per stroke	1 stroke	1	< 1	2	



TABLE 4: Potential Discharge	Volume and General Second	dary Containment Summary
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Location	Container Type	Contents	Storage Capacity (gallons)	Potential Spill Scenario	Estimated Flow Rate (gpm)	Time Required to Stop Pump (seconds)	Estimated Volume of Oil from Pumping (gallons)	Estimated Volume of Oil in Piping (gallons)	Total Spill Volume ¹ (gallons)	General Secondary Containment ¹
				Spill during filling from tanker truck	50 (est.)	15	13	16	29	Spill bucket Absorbent boom, pads, and/or clay
Old Vehicle Maintenance Building – Outside	AST	Diesel	1,000	Leak from piping	< 1 drip per minute	N/A	N/A	N/A	1	
				Spill during manual pumping from tank	< 1 gallon per stroke	1 stroke	1	< 1	2	Absorbent boom, pads, and/or clay
			<u> </u>	Mobile and Porta	ble Containers			<u>I</u>	<u>I</u>	
Five Deinte Coroge	Concreter	Disasl	100 x 2	Spill during filling at Snow Barn fuel island	10 (est.)	15	3	< 1	4	Generator enclosure
Five Points Garage	Generator	Diesel	100 x 2	Leak from piping or flexible tubing	< 1 drip per minute	N/A	N/A	N/A	1	Absorbent boom, pads, and/or clay
ARFF	Drum	New Oil	55	Spill during manual pumping from drum	< 1 gallon per stroke	1 stroke	1	< 1	2	Building Absorbent boom, pads, and/or clay
CMF/SRE or CMF-VMB	Drum	New Oil	55	Spill during manual pumping from drum	< 1 gallon per stroke	1 stroke	1	< 1	2	Containment pallet Absorbent boom, pads, and/or clay CMF (sanitary) oil/water separator
				Spill during filling from 12,000-gallon AST at CMF	20	15	5	2	7	Absorbent boom, pads, and/or clay CMF (storm) oil/water separator
CMF/SRE or CMF-VMB	Mobile refueler	Diesel	3,000 x 2	Spill during filling from mobile refueler	100	15	25	2	27	Absorbent boom, pads, and/or clay
				Leak from piping or flexible tubing	< 1 drip per minute	N/A	N/A	N/A	1	Absorbent boom, pads, and/or clay CMF (storm) oil/water separator
CMF/SRE or CMF-VMB				Spill during filling from mobile refueler	100	15	25	2	27	
	Snow broom	Diesel	125 x 2	Spill during filling at Snow Barn fuel island	10 (est.)	15	3	< 1	4	Absorbent boom, pads, and/or clay
				Leak from piping or flexible tubing	< 1 drip per minute	N/A	N/A	N/A	1	Absorbent boom, pads, and/or clay VMB or CMF (sanitary) oil/water separator



TABLE 4: Potential Discha	arge Volume and Genera	al Secondary Containment Sumr	marv

Location	Container Type	Contents	Storage Capacity (gallons)	Potential Spill Scenario	Estimated Flow Rate (gpm)	Time Required to Stop Pump (seconds)	Estimated Volume of Oil from Pumping (gallons)	Estimated Volume of Oil in Piping (gallons)	Total Spill Volume ¹ (gallons)	General Secondary Containment ¹
				Spill during filling from mobile refueler	100	15	25	2	27	Absorbent boom, pads, and/or clay
CMF/SRE or CMF-VMB	Snow broom	Diesel	75 x 2	Spill during filling at Snow Barn fuel island	10 (est.)	15	3	< 1	4	
				Leak from piping or flexible tubing	< 1 drip per minute	N/A	N/A	N/A	1	Absorbent boom, pads, and/or clay VMB or CMF (sanitary) oil/water separator
				Spill during filling from mobile refueler	100	15	25	2	27	Absorbant beam node and/or alay
CMF/SRE or CMF-VMB	Snow melter	Diesel	1,600 X 2	Spill during filling at Snow Barn fuel island	10 (est.)	15	3	< 1	4	Absorbent boom, pads, and/or clay
				Leak from piping or flexible tubing	< 1 drip per minute	N/A	N/A	N/A	1	Absorbent boom, pads, and/or clay VMB or CMF (sanitary) oil/water separator
			800 x 4	Spill during filling from mobile refueler	100	15	25	2	27	Absorbent boom, pads, and/or clay VMB or CMF (sanitary) oil/water separator
CMF/SRE or CMF-VMB	Snow melter Diesel	Diesel		Spill during filling at Snow Barn fuel island	10 (est.)	15	3	< 1	4	
				Leak from piping or flexible tubing	< 1 drip per minute	N/A	N/A	N/A	1	
	Asphalt			Spill during filling at Snow Barn fuel island	10 (est.)	15	3	< 1	4	Absorbant beam hade and/or alow
CMF/SRE	distributor	Asphalt tack	132 X 2	Leak from piping or flexible tubing	< 1 drip per minute	N/A	N/A	N/A	1	Absorbent boom, pads, and/or clay
Electrical MS No. 2 – Moat (inside)	Drum	New Oil	55	Spill during manual pumping from drum	< 1 gallon per stroke	1 stroke	1	< 1	2	Building Absorbent boom, pads, and/or clay
Electrical Vault No. 9 – Inside	Drum	New Oil	55	Spill during manual pumping from drum	< 1 gallon per stroke	1 stroke	1	< 1	2	Building Absorbent boom, pads, and/or clay
Snow Barn	Drum	New Oil	55	Spill during manual pumping from drum	< 1 gallon per stroke	1 stroke	1	< 1	2	Building Absorbent boom, pads, and/or clay
Transformers and Current Regulators										



Location	Container Type	Contents	Storage Capacity (gallons)	Potential Spill Scenario	Estimated Flow Rate (gpm)	Time Required to Stop Pump (seconds)	Estimated Volume of Oil from Pumping (gallons)	Estimated Volume of Oil in Piping (gallons)	Total Spill Volume ¹ (gallons)	General Secondary Containment ¹
JETS FBO	Transformer	Dielectric Oil	180	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Menzies Bulk Fuel Farm	Transformer	Dielectric Oil	413	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
BP Fuel Farm	Transformer	Dielectric Oil	130	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Building 203 – Parker Hannifan	Transformer	Dielectric Oil	195 (est.)	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Building 206 – Bomb Squad	Transformer	Dielectric Oil	150	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Building 207 – SkyChef/Bradford	Transformer	Dielectric Oil	195	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Building 208 – ServisAir	Transformer	Dielectric Oil	189	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Building 218 –Sky Café	Transformer	Dielectric Oil	195 (est.)	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Building 407 – NOAA Doppler Radar	Transformer	Dielectric Oil	166 (est.)	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Building 205 – Central Receiving	Transformer	Dielectric Oil	270	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Concourse C – Gate C-1	Transformer	Dielectric Oil	430 x 2	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Concrete containment Absorbent boom, pads, and/or clay
Concourse C – Upper Drive	Transformer	Dielectric Oil	212	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay



Location	Container Type	Contents	Storage Capacity (gallons)	Potential Spill Scenario	Estimated Flow Rate (gpm)	Time Required to Stop Pump (seconds)	Estimated Volume of Oil from Pumping (gallons)	Estimated Volume of Oil in Piping (gallons)	Total Spill Volume ¹ (gallons)	General Secondary Containment ¹
Consolidated Maintenance Facility	Transformer	Dielectric Oil	195	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
United Hangar	Transformer	Dielectric Oil	145	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Building 214	Transformer	Dielectric Oil	195	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
United Hangar	Transformer	Dielectric Oil	205	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
United Hangar	Transformer	Dielectric Oil	370	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Corporate Wings Hangar, M.A. Hanna, BP	Transformer	Dielectric Oil	318	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Electrical Vault No. 3	Transformer	Dielectric Oil	430 x 2	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Concrete containment Absorbent boom, pads, and/or clay
Electrical Vault No. 6	Transformer	Dielectric Oil	430 x 2	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Concrete containment Absorbent boom, pads, and/or clay
Electrical Vault No. 7	Transformer	Dielectric Oil	298 x 2	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Building Sump Absorbent boom, pads, and/or clay
Electrical Vault No. 9	Current regulator	Dielectric Oil	66	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Building Absorbent boom, pads, and/or clay
Electrical Vault No. 9	Current regulator	Dielectric Oil	60 x 2	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Building Absorbent boom, pads, and/or clay
Electrical Vault No. 9	Current regulator	Dielectric Oil	85 x 2	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Building Absorbent boom, pads, and/or clay



TABLE 4: Potential Discharge V	olume and General Seconda	ry Containment Summary

Location	Container Type	Contents	Storage Capacity (gallons)	Potential Spill Scenario	Estimated Flow Rate (gpm)	Time Required to Stop Pump (seconds)	Estimated Volume of Oil from Pumping (gallons)	Estimated Volume of Oil in Piping (gallons)	Total Spill Volume ¹ (gallons)	General Secondary Containment ¹
Electrical Vault No. 9	Current regulator	Dielectric Oil	70	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Building Absorbent boom, pads, and/or clay
Electrical Vault No. 10	Transformer	Dielectric Oil	414 (est.)	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Federal Express	Transformer	Dielectric Oil	499	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Glycol Recovery Building	Transformer	Dielectric Oil	166	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
MS 2	Transformer	Dielectric Oil	5,553 x 2	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
MS 2	Transformer	Dielectric Oil	1,564 x 2	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
MS 2	Transformer	Dielectric Oil	147 x 2	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Snow Barn	Transformer	Dielectric Oil	166 (est.)	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Constant Aviation – West	Transformer	Dielectric Oil	414	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Constant Aviation – East	Transformer	Dielectric Oil	414	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Primary Hangar	Transformer	Dielectric Oil	190	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Absorbent boom, pads, and/or clay
Elevator Reservoirs										
E1 – Terminal Building – Bridge/Baggage (City #6122)	Elevator Reservoir	Hydraulic Oil	210	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay



Location	Container Type	Contents	Storage Capacity (gallons)	Potential Spill Scenario	Estimated Flow Rate (gpm)	Time Required to Stop Pump (seconds)	Estimated Volume of Oil from Pumping (gallons)	Estimated Volume of Oil in Piping (gallons)	Total Spill Volume ¹ (gallons)	General Secondary Containment ¹
E2 – Terminal Building – Bridge/Baggage (City #6123)	Elevator Reservoir	Hydraulic Oil	210	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E3 – Terminal Building – Bridge/RTA (north) (City #6095)	Elevator Reservoir	Hydraulic Oil	210	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E4 – Terminal Building – Bridge/RTA (south) (City #6096)	Elevator Reservoir	Hydraulic Oil	210	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E17 – FSS Building (City #4688)	Elevator Reservoir	Hydraulic Oil	135	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E20 – Terminal Building – Ticketing/Baggage (south) (City #4751)	Elevator Reservoir	Hydraulic Oil	129	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E21– Terminal Building – Ticketing/Baggage (north) (City #6461)	Elevator Reservoir	Hydraulic Oil	210	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E22 – Terminal Building – Baggage Makeup/South Ticketing (City #4754)	Elevator Reservoir	Hydraulic Oil	129	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E25A – Building Maintenance Freight (City #5917)	Elevator Reservoir	Hydraulic Oil	135	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E25B – Commissary (City #5179))	Elevator Reservoir	Hydraulic Oil	135	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E26 – Custodial Office/North Moat (City #4799)	Elevator Reservoir	Hydraulic Oil	135	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E27 – Concourse A – Customs (City #4800)	Elevator Reservoir	Hydraulic Oil	129	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E28 – Concourse A – End (City #4801)	Elevator Reservoir	Hydraulic Oil	129	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay



Location	Container Type	Contents	Storage Capacity (gallons)	Potential Spill Scenario	Estimated Flow Rate (gpm)	Time Required to Stop Pump (seconds)	Estimated Volume of Oil from Pumping (gallons)	Estimated Volume of Oil in Piping (gallons)	Total Spill Volume ¹ (gallons)	General Secondary Containment ¹
E29 – Concourse C – Rotunda (City #1214)	Elevator Reservoir	Hydraulic Oil	125	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E30 – Concourse C – President's Club (City #6085)	Elevator Reservoir	Hydraulic Oil	144	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E31 – Concourse B – Gate B-1 (City #4986)	Elevator Reservoir	Hydraulic Oil	92	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E32 – Concourse B – City Operations (City #4987)	Elevator Reservoir	Hydraulic Oil	135	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E33 – Concourse C – Node to tunnel (City #6201)	Elevator Reservoir	Hydraulic Oil	210	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E34 – Concourse C – Node to tunnel (City #6202)	Elevator Reservoir	Hydraulic Oil	210	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E35 – Concourse D - Node Freight (City #6198)	Elevator Reservoir	Hydraulic Oil	210	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E36 – Concourse D – Node Passengers (City #6203)	Elevator Reservoir	Hydraulic Oil	210	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E37 – Concourse D – Compactor (City #6199)	Elevator Reservoir	Hydraulic Oil	210	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E38 – Concourse D – Tower (City #6200)	Elevator Reservoir	Hydraulic Oil	210	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay
E39 – Orange Lot to Bridge (City #7167)	Elevator Reservoir	Hydraulic Oil	116	Crack, gasket seal break, corrosion, and/or pinhole leak	1 drip per minute	N/A	N/A	N/A	< 1	Elevator room Absorbent boom, pads, and/or clay

Notes: Total spill volume estimate for a likely discharge is calculated by multiplying the Estimated Spill Flow Rate by the Time Required to Stop Pump to determine the Estimated Volume of Oil from Pumping and then adding the Estimated Volume of Oil in Piping. (1), (2), and (3) identifies the primary, secondary, and tertiary means for general secondary containment.

Refer to Section 5.3 for additional information on general secondary containment for oil transfer activities.



¹ Discharge containment materials are maintained with the DPC fuel provider and mobile refueler during filling operations. Additional discharge containment materials are maintained at the Vehicle Maintenance Building, Consolidated Maintenance Facility, ARFF building, and outside the terminal building at aircraft gates. Typically, disposable absorbent pads contain up to ½-gallon of oil per pad, clay absorbent contains up to 3 gallons of oil per bag, and booms contain up to 8 gallons of oil per boom. Additionally, the emergency response contractor maintains emergency response materials, and can immediately respond and deploy oil sorbent materials in the event of a spill, leak, etc.

²The underground storage tanks are registered under the State of BUSTR requirements and are presented on the Facility Diagram



Table 5: Sized Secondary Containment and Discharge Avoidance Summary

Location	Container Type	Contents	Storage Capacity ¹ (gallons)	Construction	Discharge Avoidance System During Container Filling	Sized Secondary Containment				
Aboveground Storage Tanks										
CMF-VMB – Bulk Storage Room	AST	New Oil	600	Double-walled steel	Sight gauge	600 gallons from double-walled tank				
CMF-VMB – Bulk Storage Room	AST	Transmission Fluid	600	Double-walled steel	Sight gauge	600 gallons from double-walled tank				
CMF-VMB – Main Bay	AST	Used Oil	1,000	Single-walled steel with steel containment	Sight gauge*	1.000 gallons from steel containment				
CMF-VMB – Main Bay	AST	Used Oil	250	Double-walled steel	Sight gauge	250 gallons from double-walled tank				
CMF-VMB – Inside Shop	AST	Used Oil	400	Double-walled steel	Sight gauge	400 gallons from double-walled tank				
CMF-VMB– Wash Bay	AST	Used Oil	250	Double-walled steel	Sight gauge	250 gallons from double-walled tank				
CMF-VMB– Weld Shop	AST	Used Oil	230	Double-walled steel	Sight gauge	230 gallons from double-walled tank				
Old Vehicle Maintenance Building – Outside	AST	New Oil	1,000	Double-walled steel	Electronic monitoring system / High liquid level alarm / Sight gauge	1,000 gallons from double-walled tank				
			Emer	gency Generator Fuel Tanks						
Concourse B – Gates B6/B8	Belly tank	Diesel	340	Double-walled steel	Electronic monitoring system / Sight gauge	340 gallons from double-walled tank				
Concourse C – Gate C7/C9	Belly tank	Diesel	950	Double-walled steel	Electronic monitoring system / High liquid level alarm / Sight gauge / Concrete containment	950 gallons from double-walled tank				
Concourse C – Gate C21	Belly tank	Diesel	550	Double-walled steel	Electronic monitoring system / High liquid level alarm / Sight gauge	550 gallons from double-walled tank				
Concourse D	AST	Diesel	250	Double-walled steel	Electronic monitoring system / High liquid level alarm	250 gallons from double-walled tank				
Electrical Vault No. 14 – Short Term Parking Garage	Belly tank	Diesel	1,500	Double-walled steel	Electronic monitoring system / High liquid level alarm / Sight gauge	1,500 gallons from double-walled tank				
Electrical Vault No. 9 (outside)	UST	Diesel	2,600	Double-walled fiberglass	Electronic monitoring system / High liquid level alarm	2,600 gallons from double-walled tank				
Electrical Vault No. 9 (inside)	Day tank	Diesel	115	Single-walled steel with steel containment	N/A	270 gallons from steel containment				
Concourse C – Gate C1	Belly tank	Diesel	2,500	Double-walled steel	Electronic monitoring system / High liquid level alarm / Spill bucket / Concrete containment	2,500 gallons from double-walled tank				
Electrical Vault No. 7 – Air Traffic Control Tower	Belly tank	Diesel	3,850	Double-walled steel	Electronic monitoring system / High liquid level alarm / Spill bucket / Concrete containment	3,850 gallons from double-walled tank				
Electrical MS No. 2 – Moat (outside)	AST	Diesel	1,250	Double-walled steel	Sight gauge	1,250 gallons from double-walled tank				
Electrical MS No. 2 – Moat (inside)	Day tank	Diesel	250	Double-walled steel	N/A	250 gallons from double-walled tank				
Electrical Vault No. 6 – Short Term Parking Garage	Belly tank	Diesel	1,250	Double-walled steel	Electronic monitoring system / High liquid level alarm / Spill bucket / Concrete containment	1,250 gallons from double-walled tank				
Electrical Vault No. 7 – Air Traffic Control Tower	Belly tank	Diesel	3,850	Double-walled steel	Electronic monitoring system / High liquid level alarm / Spill bucket / Concrete containment	3,850 gallons from double-walled tank				
Electrical Vault No. 10 (outside)	AST	Diesel	2,000	Double-walled steel	Electronic monitoring system* / High liquid level alarm* / Spill bucket	2,000 gallons from double-walled tank				
Electrical Vault No. 10 (inside)	Day tank	Diesel	200	Single-walled steel with steel containment	N/A	362 gallons from steel containment				
Electrical Vault No. 13 – Long Term Parking Garage	AST	Diesel	60	Double-walled steel	Sight gauge	60 gallons from steel containment				
Old Vehicle Maintenance Building – Outside	AST	Diesel	1,000	Double-walled steel	Spill bucket / Visual monitoring	1,000 gallons from double-walled tank				



Spill Prevention, Control and Countermeasure Plan Cleveland Hopkins International Airport

Table 5: Sized Secondary Containment and Discharge Avoidance Summary

Location	Container Type	Contents	Storage Capacity ¹ (gallons)	Construction	Discharge Avoidance System During Container Filling	Sized Secondary Containment		
Mobile and Portable Containers								
Five Points Garage	Generator	Diesel	100 x 2	Single-walled steel	Visual monitoring	None*		
ARFF	Drum	New Oil	55	Single-walled steel	N/A	None*		
CMF/SRE or CMF-VMB	Drum	New Oil	55	Single-walled steel	N/A	66 gallons from containment pallet		
CMF/SRE or CMF-VMB	Mobile Refueler	Diesel	3,000 x 2	Single-walled steel	Visual monitoring	Various OWS		
CMF/SRE or CMF-VMB	Snow broom	Diesel	125 x 2	Single-walled steel	Visual monitoring	20,000 gallons from CMF oil/water separator (storm)		
CMF/SRE or CMF-VMB	Snow broom	Diesel	75 x 2	Single-walled steel	Visual monitoring	20,000 gallons from CMF oil/water separator (storm)		
CMF/SRE or CMF-VMB	Snow melter	Diesel	1,500 X 2	Double-walled steel	Electronic monitoring system	1,500 gallons from double-walled tank		
CMF/SRE or CMF-VMB	Snow melter	Diesel	800 X 4	Double-walled steel	Electronic monitoring system	800 gallons from double-walled tank		
CMF/SRE or CMF-VMB	Asphalt distributor	Asphalt tack	132 X 2	Double-walled steel	Visual monitoring	132 gallons from double-walled tank		
Electrical MS No. 2 – Moat (inside)	Drum	New Oil	55	Single-walled steel	N/A	55 gallons from room		
Electrical Vault No. 9 – Inside	Drum	New Oil	55	Single-walled steel	N/A	None*		
Snow Barn	Drum	New Oil	55	Single-walled steel	N/A	None*		
Vehicle Maintenance Building	Drum	New Oil or Used Oil	55	Single-walled steel	N/A	64 gallons from containment pallet or 1,500 gallons from oil/water separator		

* Refer to Table 1

¹ The estimated flow rate is gradual to instantaneous for the loss of the entire container volume. Industry experience suggests that oil storage and activities associated with bulk storage containers result in spill volumes significantly smaller than the catastrophic loss of the entire tank contents. Refer to Table 4 and Section 5.3 for the likely discharge volume for tanks listed in this table.



APPENDIX A

Plan Review Certification

(40 CFR 112.5(b))

The City of Cleveland Department of Port Control (DPC) shall review and evaluate this Plan at least once every 5 years. DPC may perform more frequent reviews of the Plan following Facility changes or as determined necessary. DPC personnel will document this review and evaluation below. The documentation will be maintained with the Master Copy of this Plan for the life of the Plan. If the review and evaluation process result in the identification of required technical amendments to the Plan, the technical amendments shall be incorporated and the Plan re-certified by a licensed Professional Engineer under Section 1.1 of the Plan.

I have complet	ted a review and evaluation of this Pla will not amend the Plan as a result.	in on	(insert date)	, and DPC
Name:				
Title:				
Signature:				
Date:				
I have complet	ted a review and evaluation of this Pla will not amend the Plan as a result.	in on	(insert date)	, and DPC
Name:				
Title:				
Signature:				
Date:				
ES Envi	roScience			

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Appendix B Oil Handling Procedures

1.0 ABOVEGROUND STORAGE TANK AND UNDERGROUND STORAGE TANKS

1.1 Fill Operation

- Check the level of the receiving tank to ensure that there is enough room in the tank for the fuel you intend to load
- Place buckets or appropriate containers under connections to contain any leaks or spills
- Unroll enough hose from the delivery vehicle to reach the fill port
- Attend the delivery vehicle at all times during filling
- Fill carefully to avoid spillage and monitor levels either by sight gauges or visual/audible communication
- When filling is finished ensuring valves on the delivery vehicle are closed
- Retract the hose starting at the delivery vehicle working back to the fill port
- Clean up drips or spills using oil sorbent booms and/or clay absorbent
- Properly dispose of used absorbent materials

1.2 Maintenance

- Follow the manufacturer's procedures in the operating manual for equipment maintenance
- Ensure the equipment is serviced as often as needed or as recommended by the manufacturer
- Place spill pads or containment to absorb or capture spills or leaks during maintenance
- Shut off and de-energize pumps
- Drain all equipment into an appropriate container prior to work to avoid discharge of product
- Close valves on equipment that has the potential to discharge fuel or oil during maintenance procedures
- Test fittings and connections to ensure that there are no leaks before removing spill pads or containment
- Maintain clean equipment by eliminating external oil and grease buildup
- Clean up drips or spills using oil sorbent booms and/or clay absorbent
- Properly dispose of used absorbent materials

2.0 USED OIL STORAGE CONTAINERS

- 2.1 Fill Operation
- Check the level of the receiving tank or drum to ensure that there is enough room for the used product you intend to load

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- Empty contents of container into the tank or drum
- Fill carefully to avoid spillage and monitor levels either by sight gauges or visual/audible communication
- Clean up drips or spills using oil sorbent booms and/or clay absorbent
- Properly dispose of used absorbent materials

2.2 Unloading Operation

- Check the level of the receiving tank to ensure that there is enough room in the tank for the used product you intend to unload
- Place buckets or appropriate containers under connections to contain any leaks or spills
- Unroll sufficient hose
 - From the receiving vehicle to reach the full tank
 - From the drum to reach the used oil tank
- Attend the receiving vehicle or drum at all times during unloading
- Fill carefully to avoid spillage and monitor levels either by sight gauges or visual/audible communication
- When unloading is finished ensuring valves on the receiving vehicle and tanks are closed
- Retract the hose starting at the receiving vehicle or tank working back to the unload port
- Clean up drips or spills using oil sorbent booms and/or clay absorbent
- Properly dispose of used absorbent materials

2.3 Maintenance

- Follow the manufacturer's procedures in the operating manual for equipment maintenance
- Ensure the equipment is serviced as often as needed or as recommended by the manufacturer
- Place spill pads or containment to absorb or capture spills or leaks during maintenance
- Shut off and de-energize pumps
- Drain equipment into an appropriate container prior to work to avoid discharge of product
- Close valves on equipment that have the potential to discharge fuel or oil during maintenance procedures
- Test fittings and connections to ensure that there are no leaks before removing spill pads or containment
- Maintain clean equipment by eliminating external oil and grease buildup
- Clean up drips or spills using oil sorbent booms and/or clay absorbent



• Properly dispose of used absorbent materials

3.0 FUELING PROCEDURES

3.1 Operation

- Turn off vehicle or equipment before fueling
- Do not fill portable containers in or on motor vehicles
- Ensure the nozzle is properly seated in the vehicle or tank or transfer hose is properly connected before beginning to fuel
- Attend vehicle or tank at all times during fueling
- Cease fueling when automatic shut-off engages or when sight gauge indicates the tank is full
- Ensure valves are closed and nozzle or transfer hose has been removed and properly stored before restarting
- Clean up any spills or leaks that occur
- Properly dispose of all used absorbent materials

3.2 Maintenance

- Follow the manufacturer's procedures in the operating manual for all equipment maintenance
- Ensure the equipment is serviced as often as needed or as recommended by the manufacturer
- Place spill pads or containment to absorb or capture any spills or leaks during maintenance
- Drain all equipment into an appropriate container prior to work to avoid discharge of product
- Close valves on all equipment which have the potential to discharge fuel or oil during maintenance procedures
- Shut off all pumps
- Test all fittings and connections to ensure that there are no leaks before removing spill pads or containment
- Maintain clean equipment by eliminating external oil and grease buildup
- Clean up any spills that occur
- Puncture or crush and drain any filters before recycling or disposal
- Store used oil filters in a leak proof container
- Properly dispose of all used absorbent materials



4.0 MOBILE REFUELER PROCEDURES

4.1 Fueling

- Ensure that the operator of the vehicle or equipment to be fueled is aware that fueling is to occur
- Set the mobile refueler parking brake
- Unroll sufficient hose from the mobile refueler to reach the vehicle, equipment, or tank
- Ensure the nozzle is properly seated in the vehicle, equipment, or tank before beginning to fuel
- Attend the mobile refueler at all times during fueling
- Fill carefully to avoid spillage and monitor levels either by sight gauges or visual/audible communication
- Ensure valves are closed and the nozzle has been removed and is properly stored before restarting
- Ensure the fuel tank cap has been secured in place before restarting the vehicle or equipment
- Clean up drips or spills using oil sorbent booms and/or clay absorbent
- Properly dispose of used absorbent materials

4.2 Maintenance

- Follow the manufacturer's procedures in the operating manual for equipment maintenance
- Ensure the equipment is serviced as often as needed or as recommended by the manufacturer
- Place spill pads or containment to absorb or capture spills or leaks during maintenance
- Shut off and de-energize pumps
- Drain equipment into an appropriate container prior to work to avoid discharge of product
- Close valves on equipment that have the potential to discharge fuel or oil during maintenance procedures
- Test fittings and connections to ensure that there are no leaks before removing spill pads or containment
- Maintain clean equipment by eliminating external oil and grease buildup
- Puncture or crush and drain fuel filters before recycling or disposal
- Store used fuel filters in a leak proof container
- Clean up drips or spills using oil sorbent booms and/or clay absorbent
- Properly dispose of used absorbent materials

5.0 DRUM HANDLING PROCEDURES

• Set the brakes and chock the wheels on the delivery vehicle



- Visually inspect the drum(s) on the delivery vehicle to identify their contents and to evaluate drum integrity
- Do not accept or store drums that are rusty, damaged, dented, or leaking as they may leak at a future time
- If you are not sure of the contents or something does not appear right with the materials or the type of drum used, do not accept it. Reject the shipment and return the drum(s) to the vendor.
- Attend vehicle at all times during loading or unloading
- Material handling equipment used to transfer drums must be selected, positioned, and operated to minimize potential damage to the drums
- If a spill occurs, stop and immediately deploy absorbent materials and follow spill cleanup and reporting procedures
- When possible, drums should be stored indoors to prevent exposure to storm water
- Drums stored outdoors should be covered and provided with secondary containment
- Drums should be raised off the storage area floor and on secondary containment pallets to prevent corrosion through "sweating" of the floor surface
- Rows of drums should be spaced to allow for the ability to visually inspect each drum for corrosion and leaks
- Equipment or tools should not be leaned against drums

6.0 OIL-FILLED OPERATIONAL EQUIPMENT PROCEDURES

6.1 Maintenance

- Follow manufacturer's procedures in the operating manual for equipment maintenance
- Ensure equipment is serviced as often as needed or as recommended by the manufacturer
- Place spill pads or containment to absorb or capture spills or leaks during maintenance
- Shut off and de-energize pumps
- Close valves on equipment that have potential to discharge oil during maintenance procedures
- Test fittings and connections to ensure there are no leaks before removing spill pads or containment
- Maintain clean equipment by eliminating external oil and grease buildup
- Clean up drips or spills using oil sorbent booms and/or clay absorbent
- Properly dispose used absorbent materials



Appendix C

Contact List

Emergency Response Contacts & Noti cations								
Emergency Response Contact List								
Name	Organizatior	ו	Phone Number					
CLE Ops	CLE Airport		216-265-6090					
CLE ARFF	CLE Airport		216-265-4888					
Kim McGreal	CLE Airport		216-857-6867					
Beau Williams	CLE Airport		216-857-7036					
Mike Reilly	CLE Airport		216-857-7587					
EnviroScience 24-Hour ER Hotline	EnviroScience		888-866-8540					
Kyle Lawrence	EnviroScience		330-808-2386					
EMS One-Call	Нерасо		877-816-9111					
Joel Rehmer	Нерасо		808-349-8386					
	Notific	ations						
Organization		Contact Number						
National Response Center		800-424-8802						
Ohio EPA		800-282-9378						
Cuyahoga County LEPC		216-771-1365						
NEORSD		216-641-3200						
NASA FOC Dispatch		216-433-2088						



Appendix D

Discharge Response Responsibilities

1.0 GENERAL DISCHARGE CONTROL RESPONSIBILITIES

This section presents a general description of discharge response roles and responsibilities of the City of Cleveland Department of Port Control (DPC), fuel providers, tenants who use or store oil products, and emergency responders at Cleveland Hopkins International Airport (CLE). It is DPC's goal to eliminate the migration of discharges and leaks from CLE, thereby minimizing environmental impacts and subsequent cleanup costs. A cooperative effort between DPC, its tenants, fuel providers, and emergency responders is essential to accomplish this goal.

1.1 DPC

DPC assumes responsibility for the response to and cleanup of discharges for which they are responsible. DPC's overall responsibilities may include:

- Providing spill response capabilities through Airport Rescue and Fire Fighting (ARFF)
- Providing spill response kits, containment booms, and disposal containers in specific areas
- Ensuring that the appropriate authorities are notified by the responsible party of all reportable spills
- Contracting with a spill response company to contain and clean up DPC's discharges that leave the paved areas or enter the storm water drainage system and dispose of material placed in the disposal containers
- Providing a Spill Coordinator to serve as a liaison for spill response actions, including observing tenants during spill response and reporting spills
- Providing training on response procedures for DPC personnel at CLE
- Maintaining a written summary on all discharge events
- Modifying and updating the Spill Prevention, Control and Countermeasure (SPCC) plan for DPC operations at CLE as necessary

1.2 Fuel Providers and Tenants

Off-site and airport-based fuel providers and tenants are responsible for response, containment, cleanup, and disposal of all materials associated with discharges for which they are responsible. Responsible entities are to respond in accordance with their own SPCC or spill plan and are required to contact the Spill Coordinator and complete a written Spill Report for discharges occurring on DPC-owned property.

Responsible entities can use the spill response equipment provided by DPC for discharges but are required to pay for the disposal and replacement of the used materials. Responsible entities are also responsible for all costs (including fines, penalties, and potential environmental liabilities) associated with the cleanup of spills.



Appendix E

Discharge Reporting Procedures

1.0 VERBAL NOTIFICATION

Verbal notification from the person discovering a release of a reportable quantity of oil from Cleveland Hopkins International Airport (CLE) is critical to promptly begin spill response and containment measures. The Ohio Environmental Protection Agency (Ohio EPA) defines a reportable quantity spill of oil as a release of oil 25 gallons or more discharged from the responsible entity's property or any spill volume that causes a visible sheen or film upon navigable waters. DPC-related spills of 25 gallons or more of oil leaving DPC-operated property or causing a visible sheen or film upon navigable waters are reportable. The following entities must be contacted within the specified timeframes using the information on the Contact List in **Appendix C**:

Immediately after release, regardless of quantity:

- Airport Operations
- Airport Rescue and Fire Fighting (ARFF)
- Spill Coordinator

Within 30 minutes of a release into the Facility drainage system:

- Cuyahoga County Local Emergency Response Coordinator
- Ohio EPA and Northeast Ohio Regional Sewer District
- Cleveland Fire Department

Within 30 minutes of a release of a reportable quantity:

- Ohio EPA
- Cleveland Fire Department
- Cuyahoga County Local Emergency Response Coordinator

Use the Spill Report, provided in this appendix, to document these notifications.

2.0 WRITTEN NOTIFICATION

2.1 Internal Notification

The Spill Coordinator, or designee, will complete a written Spill Report (provided in this appendix) to document all CLE discharges within 24 hours. A blank copy of the Spill Report will be available to employees and tenants responsible for reporting discharges, and will be completed for each discharge. The individual reporting the discharge should be prepared to provide as much of the following information as possible including:



- Contact name
- Address
- Location of discharge
- Phone number
- Date of discharge
- Time of discharge
- Material discharged
- Total quantity spilled or leaked
- Quantity discharged to navigable waters of the United States or adjoining shorelines
- Source of discharge
- Affected media
- Cause of discharge
- Damages or injuries caused by the discharge
- Actions used to stop, remove, and mitigate the effects of the discharge
- Names of individuals and/or organizations who have been contacted

2.1 Written Reports to Ohio EPA

The Spill Coordinator, or designee, shall complete a written spill report for reportable quantity spills generated by DPC. The Spill Coordinator shall submit the written report to the Ohio EPA within 30 days of the spill event. If this report cannot be submitted to Ohio EPA within 30 days, a preliminary report must be written which shall be superseded by a final report due no later than 90 days after the spill occurrence. Content requirements for the written report are presented in the guidance document provided in this appendix.



Appendix F

Discharge Response Procedures

1.0 RESPONSE LOCATIONS

Oil and fuel handling, storage, and transportation at Cleveland Hopkins International Airport (CLE) may cause discharges that have the potential to enter the Facility drainage system. These procedures are intended to provide information on potential spills and leaks and the spill countermeasures to be initiated to prevent a discharge of oil or fuel to navigable waters.

The drainage system at CLE consists of a network of inlets, pipes, open swales, channels, and drainage basins as presented on the Facility Diagram in **Figure 1** Identifying these structures is useful for predicting the pathway a spill may follow and where spill countermeasures should be deployed to prevent further migration. **Figure 1** also identifies potential spill response locations along these spill pathways. **Table 4** identifies potential oil release sources from the City of Cleveland Department of Port Control (DPC) operations, including anticipated flow rates and total potential discharge quantities.

This Plan requires that personnel discovering a discharge make proper notification. Critical data collected during this notification includes information on the size of the discharge, weather conditions, and determination if the discharge has reached local storm drains. Using these three parameters, responders can determine where to initially deploy resources.

Once on scene, responders must determine if the spill has passed that particular response location and proceeded further downstream. The time difference between the spill occurrence and discovery; initial discharge volume; storm event precipitation; and location of initial discharge relative to the storm water conveyance system may affect whether a spill passes the prescribed response location. This could require deployment to subsequent response locations.

If no spilled oil or fuel is encountered at a designated location, response personnel should deploy equipment at that location and proceed to upstream response locations. Once oil is encountered, response equipment should be deployed at that location to reduce the overall migration of the spill.

2.0 SPECIFIC DISCHARGE CONTROL RESPONSIBILITIES

Discharge response procedures are designed to assist DPC, fuel providers, and tenants to prevent discharge migration. Several critical roles are required in order to contain a discharge including:

- Person discovering discharge
- Spill Coordinator
- Tenant and fuel providers
- Airport Operations
- Airport Rescue and Fire Fighting (ARFF)
- Response contractor

2.1 Person Discovering Discharge

The responsibilities of the person discovering the discharge include the following:



- Regardless of quantity, immediately stop the discharge, if possible, without the risk of personal injury
- Immediately notify Airport Operations, ARFF, and the Spill Coordinator
- Remove the source of the discharge from the vicinity, if near a storm sewer opening or floor drain
- Contain the discharge until ARFF arrives by using booms to create a confinement area around the perimeter of the discharge
- If the discharge is threatening a storm sewer or floor drain, place a Spill Stopper mat over the nearest drain that is potentially affected and contain the discharge using booms and clay absorbent
- Place spill pads over the discharge area taking note where they are placed
- Avoid contact with spill response materials by using rubber gloves, goggles, and rubber boots
- Dispose of all materials as presented in Section 5.1.2.5 of this Plan
- Report the discharge to the Spill Coordinator using the contact information presented in Appendix C

2.2 Spill Coordinator

The Spill Coordinator's role is to assist, if necessary, with responding to incidents for discharges, to witness containment and cleanup activities, and to collect information on the circumstances of all discharges at CLE facilities. The Spill Coordinator will incorporate information only for DPC's discharges into a database that will be maintained with the Master Copy of this Plan. The Spill Coordinator will also complete the Spill Report found in **Appendix E** and notify appropriate authorities for all DPC discharges. For incidental discharges the Spill Coordinator is also required to complete the following activities:

- Determine if it is necessary for the gate valves at the North Detention Basin (Outfalls 001, 002, and Rental Car Facility) to be closed
- Determine if it is necessary to deploy response materials in sewers off Cargo Road or in Abram Creek just downstream of the Eastland Road overpass for spills within the Drainage Area 003; additional response materials can be deployed at the Kolthoff Road overpass and culvert entrance at the cul-de-sac on Grayton Rd.
- If spill is near the South Retention Basin, additional response materials can be deployed at the Kolthoff Road overpass and culvert entrance at the cul-de-sac on Grayton Rd.
- Determine if it is necessary to close gate valves to and from the CMF oil/water separator on the storm sewer system or deploy response materials on NASA property at the end of the storm sewer pipe off Walcott Road or in Abram Creek at the bottom of Duct Bank Road off West Area Road for spills within Drainage Area 006
- Determine if it is necessary to deploy response materials in sewers off West Hangar Road, on NASA property at the end of the NASA Outfall pipe 015 for CLE Drainage Area 008 and NASA Outfall pipe 017 for CLE Drainage Areas 010 and 011, or in the Rocky River in the Cleveland Metroparks under the overpasses for Brookpark Road, I-480, and Puritas Roads or anywhere along the Rocky River as needed



- Determine if it is necessary to deploy response materials in the Central Detention Basin and/or at the Abram Creek Downstream Spillway located off Cedar Point Road or along points of the Rocky River downstream of the Abram Creek confluence for spills in Drainage Area 012
- Obtain discharge information including cause of spill, material, quantity, and related information
- Determine the need for the response contractor
- Identify the probable downstream discharge location

2.3 Tenant and Fuel Providers

Tenants and fuel providers are responsible for response, containment, cleanup, disposal of all materials associated with discharges, and reporting incidents to the appropriate authorities. All response actions shall be conducted in accordance with their Spill Prevention, Control and Countermeasure (SPCC) or spill response plans, working closely with the Spill Coordinator. For incidental discharges from an activity performed by the person discovering the discharge:

- Regardless of quantity, immediately stop the discharge, if possible, without the risk of personal injury
- Immediately notify Airport Operations, ARFF, and the Spill Coordinator
- Remove the source of the discharge from the vicinity, if near a storm sewer opening
- Contain the discharge until ARFF arrives by using booms to create a confinement area around the perimeter of the discharge
- If the discharge is threatening a storm sewer or floor drain, place a Spill Stopper mat over the nearest drain that is potentially affected and contain the discharge using booms and clay absorbent
- Place spill pads over the discharge area taking note where they are placed
- Avoid contact with spill response materials by using rubber gloves, goggles, and rubber boots
- Dispose of all materials as presented in Section 5.1.2.5 of this Plan
- Report the discharge to the Spill Coordinator and appropriate authorities using the contact information presented in **Appendix C**

2.4 ARFF

ARFF will respond to oil spills at CLE and observe the scene for fire hazards, witness cleanup, and fill out a report as directed by its Standard Operating Procedures. The response by ARFF in these situations will be solely to advise and eliminate a fire hazard.

2.5 Airport Operations

For incidental discharges which are less than 25 gallons or do not cause a visible sheen or film on navigable waters:

- Advise Tower to caution or reroute aircraft if deemed necessary by ARFF
- Institute notification to DPC management if appropriate
- Enter incident into log

EnviroScience Excellence In Any Environment For discharges greater than 25 gallons or that cause a sheen or film on navigable waters:

- Advise Tower to caution or reroute aircraft if deemed necessary by ARFF
- Close appropriate affected surfaces by Notice to Airmen (NOTAM)
- Respond to command area
- Assist with DPC equipment if requested by the Spill Coordinator
- After emergency is secured, open affected surfaces by NOTAM
- Institute notification to appropriate DPC management personnel

2.6 Response Contractor

As necessary, and as requested by the Spill Coordinator, DPC will engage the response contractor who will be responsible for:

- Evaluating the downstream areas around CLE to identify likely response locations in the event of potential discharges
- Responding to a discharge event to any location on the airfield or downstream of the Facility. The Spill Coordinator will identify the initial response location.
- Containing the discharge to minimize the discharge migration and subsequent cleanup
- Cleaning up the discharge
- Disposing of all materials resulting from the cleanup activity according to Federal, State, and local regulations
- Providing DPC with a spill response summary that details its involvement in the discharge event, including detailed descriptions of the response process and documentation of the date and time of each action
- Complying with all CLE and Federal Aviation Administration (FAA) requirements while on CLE property
- Ensuring that all staff involved in the discharge cleanup have met the appropriate cleanup operations training requirements
- Providing copies of all waste disposal documents including, but not limited to waste manifests and certificates of destruction for all destroyed wastes

The response contractor will not make any public comments (i.e., media) and will refer all questions to the Spill Coordinator or designee. The Spill Coordinator will perform all reporting to the necessary entities and provide the airport media relations coordinator, commissioner, or Director information needed for addressing the media but will not address the media without direction from airport executive staff.



Appendix G

Inspection and Test Procedures

The inspection and testing procedures described in this appendix are required to be completed at the specified frequencies by City of Cleveland Department of Port Control (DPC) or designated personnel adequately trained to perform the required tasks.

1.0 PRIOR TO USE

- Visually assess the general condition of containers, aboveground valves, aboveground piping, and other appurtenances looking for drips or leaks.
- Evaluate hoses, switches, seals, gaskets, gauges, and other instrumentation to ensure that they are working properly.
- Immediately address leaks or spills in accordance with **Appendix F** of this Plan.

2.0 WEEKLY INSPECTIONS

Inspect secondary containment for accumulated precipitation or product. Drain only if no visible sheen or product is present. If product is present, contact Spill Coordinator listed in Appendix C for proper disposal procedures. Maintain records of the inspections and releases of clean storm water with the Master Copy of this Plan for a minimum of 3 years.

3.0 MONTHLY INSPECTIONS AND TESTS

3.1 ASTs

- Perform a monthly inspection of each Aboveground Storage Tank (AST) and emergency generator listed in **Table 3** in accordance with the Steel Tank Institute (STI) September 2011 *Standard for the Inspection of Aboveground Storage Tanks* (document number SP001) utilizing form "STI SP001 Monthly Inspection Checklist" located in the Master Copy of the Plan. Maintain records of the inspections with the Master Copy of this Plan for a minimum of 3 years.
- Test audible alarm on high liquid level alarms. Maintain records of the test with the Master Copy of this Plan for a minimum of 3 years.
- Verify that sight gauges are free floating and unobstructed.

3.2 USTs

- Perform a release detection test on the emergency generator Underground Storage Tank (UST) at Electrical Vault No. 9 in accordance with Ohio Administrative Code (OAC) rule 1301:7-9-07. Maintain records of the test with the Master Copy of this Plan for a minimum of 3 years.
- Test audible alarm on high liquid level alarm. Maintain records of the test with the Master Copy of this Plan for a minimum of 3 years.

3.3 Portable and Mobile Containers

• Perform a monthly inspection of each portable/mobile storage container listed in **Table 3** in accordance with the STI September 2011 *Standard for the Inspection of Aboveground Storage Tanks* (document number SP001) utilizing form "STI SP001 Portable Container



Monthly Inspection Checklist" located in the Master Copy of the Plan. Maintain records of the inspections with the Master Copy of this Plan for a minimum of 3 years.

3.4 Vehicle Maintenance Building Oil/Water Separator

Inspect oil/water separator at the Vehicle Maintenance Building for the presence of oil. If more
than 2 inches of oil are present, contact the Spill Coordinator listed in Appendix C for proper
disposal procedures. Based on the current volume of work at the VMB and with reference to
past inspections, the frequency of OWS inspections will be performed once every two months.
If the Spill Coordinator identifies that oil storage levels are increasing, inspection frequency
will increase too monthly. Maintain records of the inspections with the Master Copy of this
Plan for a minimum of 3 years.

3.5 Transformers, Current Regulators, and Oil-filled Equipment

 Visually inspect transformers, current regulators, and oil-filled equipment listed in Table 3 for equipment integrity (e.g., dents, scratches, cracks, corrosion, etc.) and for the presence of drips, leaks, and pooling of oil on and around the equipment. Maintain records of the inspections with the Master Copy of this Plan for a minimum of 3 years.

3.6 Buried Piping

 Inspect exposed underground piping for the emergency generator UST at Electrical Vault No. 9 and 1,000-gallon used oil AST at the Vehicle Maintenance Building for deterioration or the presence of drips, leaks, and pooling of oil. If product is present, contact the Spill Coordinator listed in Appendix C for proper disposal procedures.

3.7 Spill Carts

• Examine spill carts to ensure that adequate amounts of materials are available at each location.

4.0 ANNUAL INSPECTIONS AND TESTS

4.1 Oil/Water Separators and Dead-End Sump

Inspect oil/water separators and the dead-end sump at Electrical Vault No. 7 for the presence of oil. If more than 2 inches of oil are present, contact the Spill Coordinator listed in Appendix C for proper disposal procedures. Maintain records of the inspections with the Master Copy of this Plan for a minimum of 3 years.

5.0 ANNUAL INSPECTIONS AND TESTS

5.1 ASTs

- Perform an annual inspection of each AST and emergency generator listed in **Table 3** in accordance with the STI September 2011 *Standard for the Inspection of Aboveground Storage Tanks* (document number SP001) utilizing form "STI SP001 Annual Inspection Checklist" located in the Master Copy of the Plan. Maintain records of the inspections with the Master Copy of this Plan for a minimum of 3 years.
- Test emergency shutoff devices and float switches on high liquid level alarms. Maintain records of the test with the Master Copy of this Plan for a minimum of 3 years.

5.2 USTs

• Test meters, gauges, and instruments to determine if they are properly calibrated. Maintain records of the test with the Master Copy of this Plan for a minimum of 3 years.



- Test emergency shutoff devices and float switches on high liquid level alarms. Maintain records of the test with the Master Copy of this Plan for a minimum of 3 years.
- Perform tightness test for the emergency generator UST at Electrical Vault No. 9 in accordance with OAC rule 1301:7-9-07(C). Maintain records of the test with the Master Copy of this Plan for a minimum of 3 years.

6.0 ADDITIONAL INSPECTIONS

6.1 **ASTs**

• Inspections other than those described in the above sections is not warranted at this time.



Appendix H

Training Procedures

The City of Cleveland Department of Port Control (DPC) has instituted a general spill prevention and response training program at Cleveland Hopkins International Airport (CLE) to prevent spills from occurring, prevent spills that do occur from reaching surface waters, and minimize or eliminate potential environmental impacts. DPC staff with the reasonable potential to encounter a spill during normal daily operations at CLE, or whose job responsibilities include working with potential spill sources at CLE, are required to attend training at least once a year. In addition, new employees meeting these criteria must receive spill response training within one week of their employment at CLE. Annual and new employee training records and materials will be inserted into this section of the Master Copy of the Plan upon completion of the training session. Training records are maintained with the Master Copy of this Plan for a minimum of 3 years.

The training program includes the following components:

- Applicable pollution control statutes, regulations, and policies
- General Facility operations
- Contents of this SPCC Plan
- Operation and maintenance of equipment to prevent discharges
- Discharge procedure protocol
- Inspections, testing, and records
- Spill control and countermeasure protocols

In addition to the training described above, DPC staff participates in routine spill prevention briefings to review spills and ensure adequate understanding and effectiveness of the Spill Prevention, Control and Countermeasure (SPCC) Plan.

Insert Training Materials and Attendance Records

The inspection and testing procedures described in this appendix are required to be completed at the specified frequencies by City of Cleveland Department of Port Control (DPC) or designated personnel adequately trained to perform the required tasks.

1.0 PRIOR TO USE

- Visually assess the general condition of containers, aboveground valves, aboveground piping, and other appurtenances looking for drips or leaks.
- Evaluate hoses, switches, seals, gaskets, gauges, and other instrumentation to ensure that they are working properly.
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 Inspect secondary containment for accumulated precipitation or product. Drain only if no visible sheen or product is present. If product is present, contact Spill Coordinator listed in Appendix C for proper disposal procedures. Maintain records of the inspections and releases of clean storm water with the Master Copy of this Plan for a minimum of 3 years.

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3.7 Spill Carts

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4.0 ANNUAL INSPECTIONS AND TESTS

4.1 Oil/Water Separators and Dead-End Sump

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5.2 USTs

- Test meters, gauges, and instruments to determine if they are properly calibrated. Maintain records of the test with the Master Copy of this Plan for a minimum of 3 years.
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The training program includes the following components:

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- Discharge procedure protocol
- Inspections, testing, and records
- Spill control and countermeasure protocols

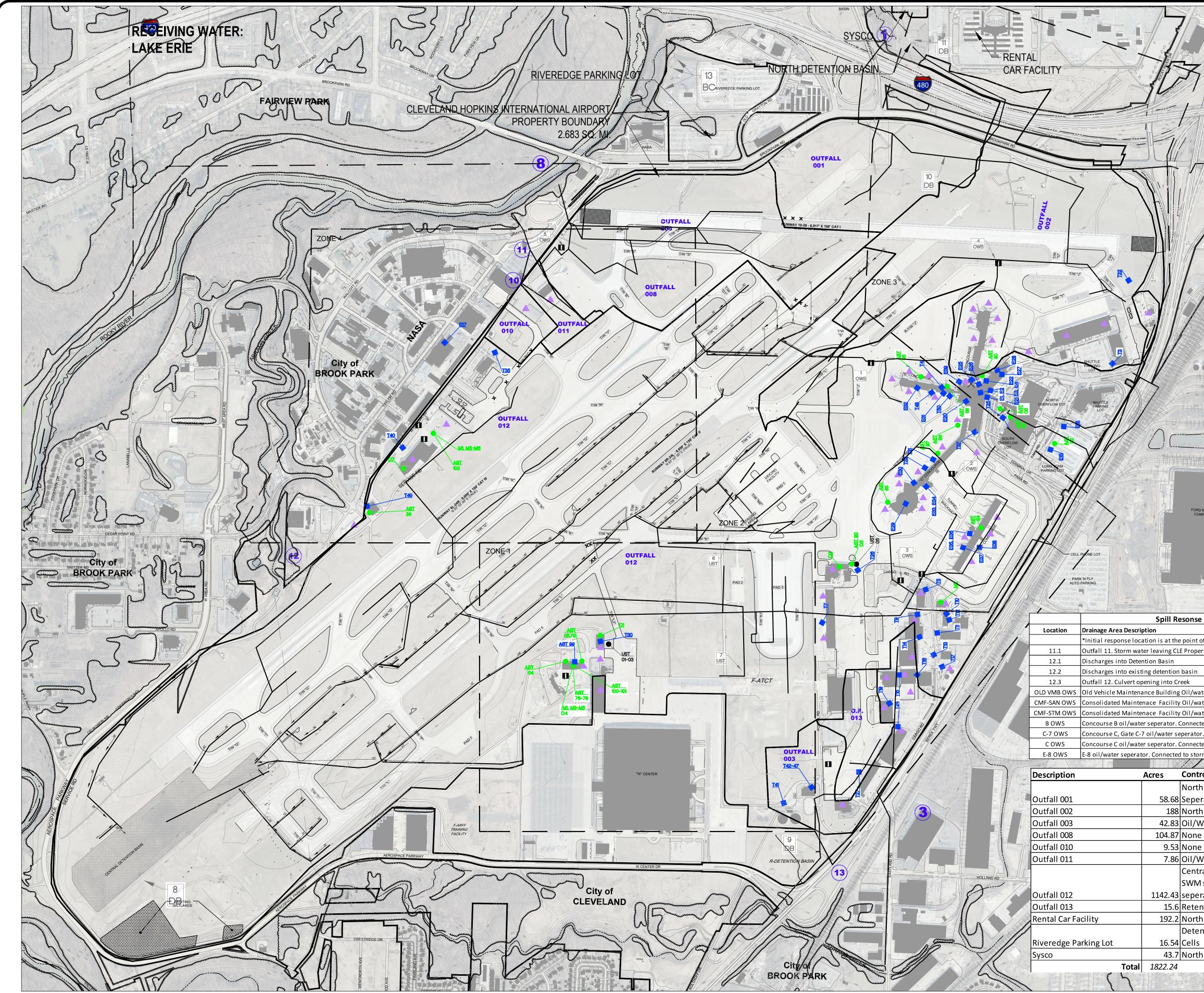
In addition to the training described above, DPC staff participates in routine spill prevention briefings to review spills and ensure adequate understanding and effectiveness of the Spill Prevention, Control and Countermeasure (SPCC) Plan.

Insert Training Materials and Attendance Records

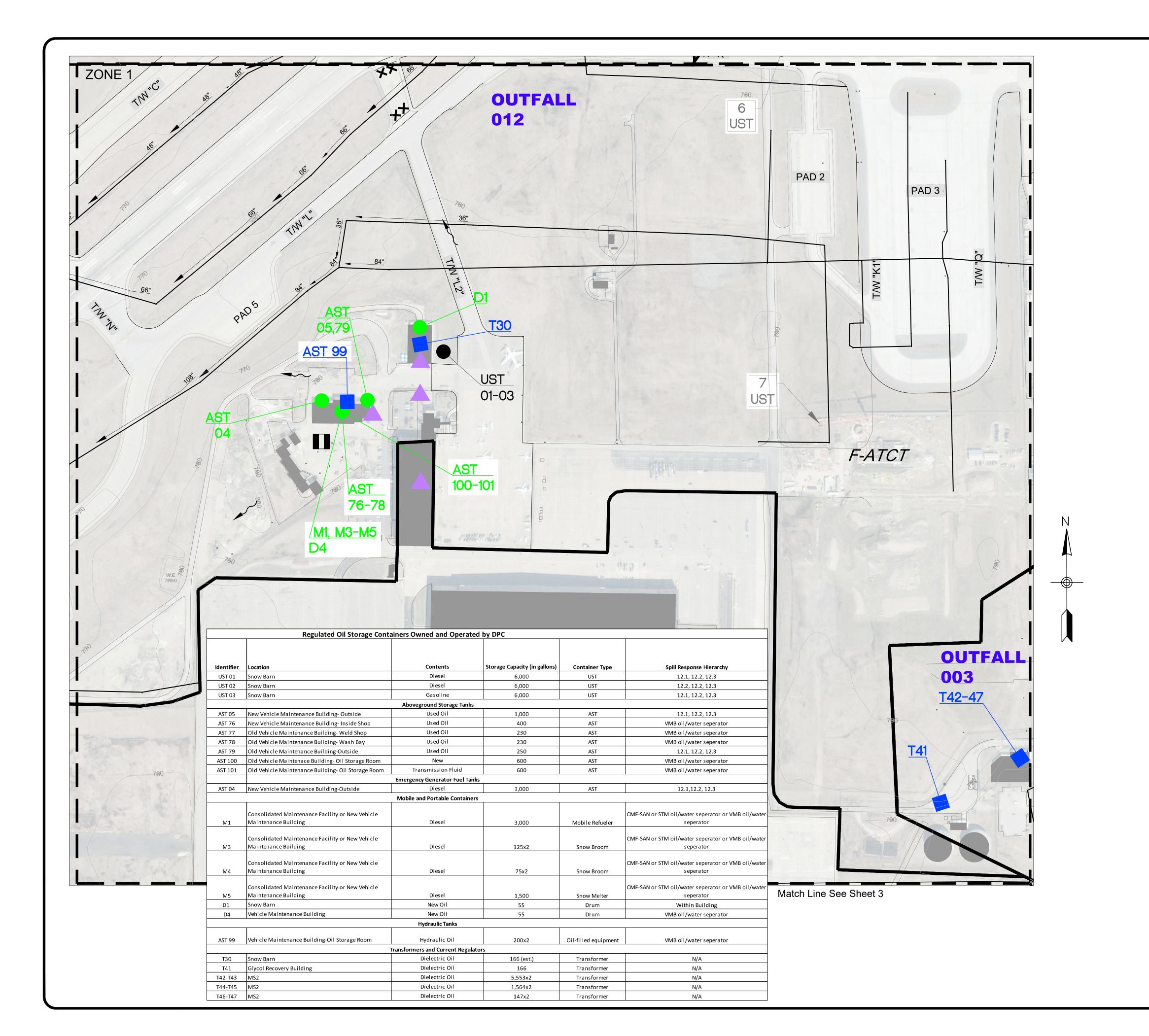
Figure 1: CLE Site Map

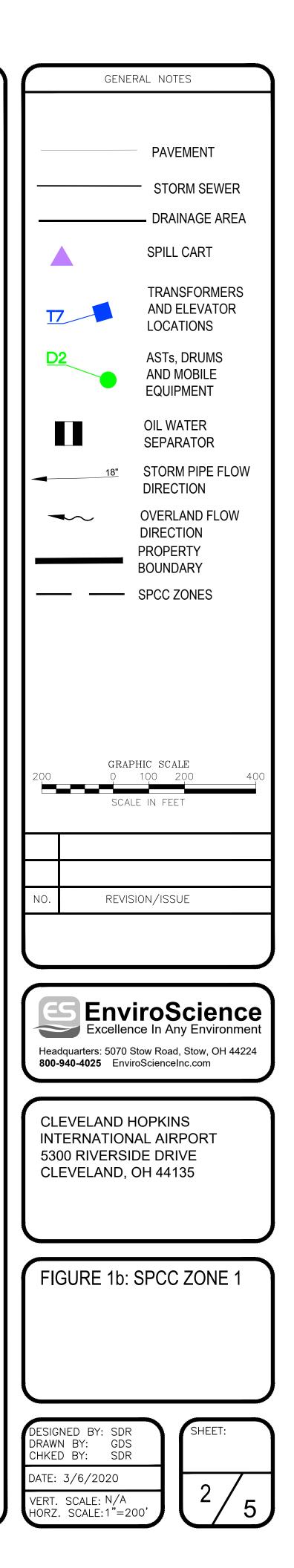
Figure 2: CLE Response Flow Chart

Figure 3: Potential spill response locations



-2		GENERAL NOTES
		PAVEMENT
		STORM SEWER
		DRAINAGE AREA
		SPILL CART
		TRANSFORMERS AND ELEVATOR LOCATIONS
		ASTs, DRUMS AND MOBILE EQUIPMENT
		OIL WATER SEPARATOR
		OVERLAND FLOW
		PROPERTY
51	N	BOUNDARY
	N	SPCC ZONES
		GRAPHIC SCALE 600 0 300 600 1200
D MOTOR MPANY		SCALE IN FEET
		NO. REVISION/ISSUE
e Location Summary		
of origin followed by the nearest catch basin or	drain	
erty. Discharges into Outfall 007		EnviroScience
		Excellence In Any Environment
ater seperator. Connected to sanitary sewer ater seperator. Connected to sanitary sewer		Headquarters: 5070 Stow Road, Stow, OH 44224 800-940-4025 EnviroScienceInc.com
ater seperator. Connected to storm sewer ted to storm sewer		
or. Connected to storm sewer ted to storm sewer		CLEVELAND HOPKINS
rm sewer		INTERNATIONAL AIRPORT 5300 RIVERSIDE DRIVE
rols	Stream	CLEVELAND, OH 44135
h Detention Basin and Oil/Water erator	Silver Creek	
h Detention Basin	Silver Creek	
Water Seperator	Abram Creek	
e	Rocky River Abram Creek	
Water Seperator	Rocky River	FIGURE 1a: SPCC OVERALL
ral Detention Basin, underground		MAP
1 system and sand filter, and Oil/Wate rators	Rocky River	
ntion Basin	Abram Creek	
h Detention Basin Intion Basin and two Bioretention	Silver Creek	
h Detention Basin	Silver Creek Silver Creek	DESIGNED BY: SDR SHEET:
		DRAWN BY: GDS CHKED BY: SDR
ŏ		
ŏ		DATE: 3/6/2020 VERT. SCALE: N/A HORZ. SCALE:1"=600'





AST 85			Storage Capacity (in gallons)	Container Type	Spill Response Hierarchy
AST 85	Emerg	gency Generator Fu	el Tanks		
A31 03	Concourse C- Gase 21	Diesel	550	Belly Tank	C-7 & E-8 oil/water seperators, 12.1, 12.2, 12.
UST 05	Electrical Vault No. 9 (outside)	Diesel	2,600	UST	12.1, 12.2, 12.3
AST 90	Electrical Vault No. 9 (inside)	Diesel	115	Day Tank	Within Building
AST 94	Concourse D	Diesel	250	AST	Within Building
AST 95	Concourse B- Gates B7/B8	Diesel	340	Belly Tank	Within Building
AST 96	Concourse C- Gate C1	Diesel	2,500	Belly Tank	C-7 & E-8 oil/water seperators, 12.1, 12.2, 12
AST 97	Concourse C- Gate C9	Diesel	950	Belly Tank	C-7 & E-8 oil/water seperators, 12.1, 12.2, 12
AST 98	Electrical Vault No. 7- Air Traffic Control Tower	Diesel	3,850	Belly Tank	Concourse B oil/water seperator, 11.1
	Mobil	le and Portable Con	tainers		
M2	5 Points Garage	Diesel	100x2	Generator	12.1, 12.2, 12.3
D2	ARFF	New Oil	55	Drum	Within Building
D5	Electrical Vault No. 9	New Oil	55	Drum	Within Building
	Transfor	mers and Current R	Regulators		
T5	Building 203-Parker Hannifan	Dielectric Oil	195 (est.)	Transformer	N/A
T7	Federal Express	Dielectric Oil	499	Transformer	N/A
Т9	Air Services	Dielectric Oil	180	Transformer	N/A
T10	Building 206- Engineering Building	Dielectric Oil	150	Transformer	N/A
T11	Building 207-SkyChef/Bradford	Dielectric Oil	195	Transformer	N/A
T12	Building 205-Central Receiving	Dielectric Oil	270	Transformer	N/A
T13	Building 208- ServisAir	Dielectric Oil	189	Transformer	N/A
T14	New Continental Hangar	Dielectric Oil	370	Transformer	N/A
T15	Continental Hangar-Vehical Maintenance	Dielectric Oil	205	Transformer	N/A
T16	Continental Hangar-R.O.C Building	Dielectric Oil	195	Transformer	N/A
T17	ASIG Bulk Fuel Farm	Dielectric Oil	413	Transformer	N/A
T19	Building 218- Chelsea Catering	Dielectric Oil	195 (est.)	Transformer	N/A
T24	US Air, United Cargo Building	Dielectric Oil	190	Transformer	N/A
T26	Electrical Vault No. 9	Dielectric Oil	66	Current Regulator	N/A
T26	Electrical Vault No. 9	Dielectric Oil	60x2	Current Regulator	N/A
T26	Electrical Vault No. 9	Dielectric Oil	85x2	Current Regulator	N/A
T26	Electrical Vault No. 9	Dielectric Oil	70	Current Regulator	N/A
T27	Continental Hangar- Freight	Dielectric Oil	145	Transformer	N/A
T31-T32	Concourse C-Gate C-9	Dielectric Oil	430x 2 (est.)	Transformer	N/A
T37	Concourse G- Upper Driver	Dielectric Oil	212	Transformer	N/A
T50	Concourse C- Gate C-1	Dielectric Oil	430x2	Transformer	N/A
	·	Elevator Reservoir	s		
E20	Terminal Building-Ticket/Baggage (south)	Hydraulic Oil	129	Elevator Reservoir	N/A
E29	Concourse C-Rotunda	Hydraulic Oil	125	Elevator Reservoir	N/A
E30	Concourse C- President's Club	Hydraulic Oil	144	Elevator Reservoir	N/A
E31	Concourse B-Gate B-1	Hydraulic Oil	92	Elevator Reservoir	N/A
E32	Concourse B- City Operations	Hydraulic Oil	135	Elevator Reservoir	N/A
E33	Concourse C- Node to tunnel	Hydraulic Oil	210	Elevator Reservoir	N/A
E34	Concourse C- Node to tunnel	Hydraulic Oil	210	Elevator Reservoir	N/A
E35	Concourse D	Hydraulic Oil	210	Elevator Reservoir	N/A
E36	Concourse D	Hydraulic Oil	210	Elevator Reservoir	N/A
E37	Concourse D- Compactor	Hydraulic Oil	210	Elevator Reservoir	N/A

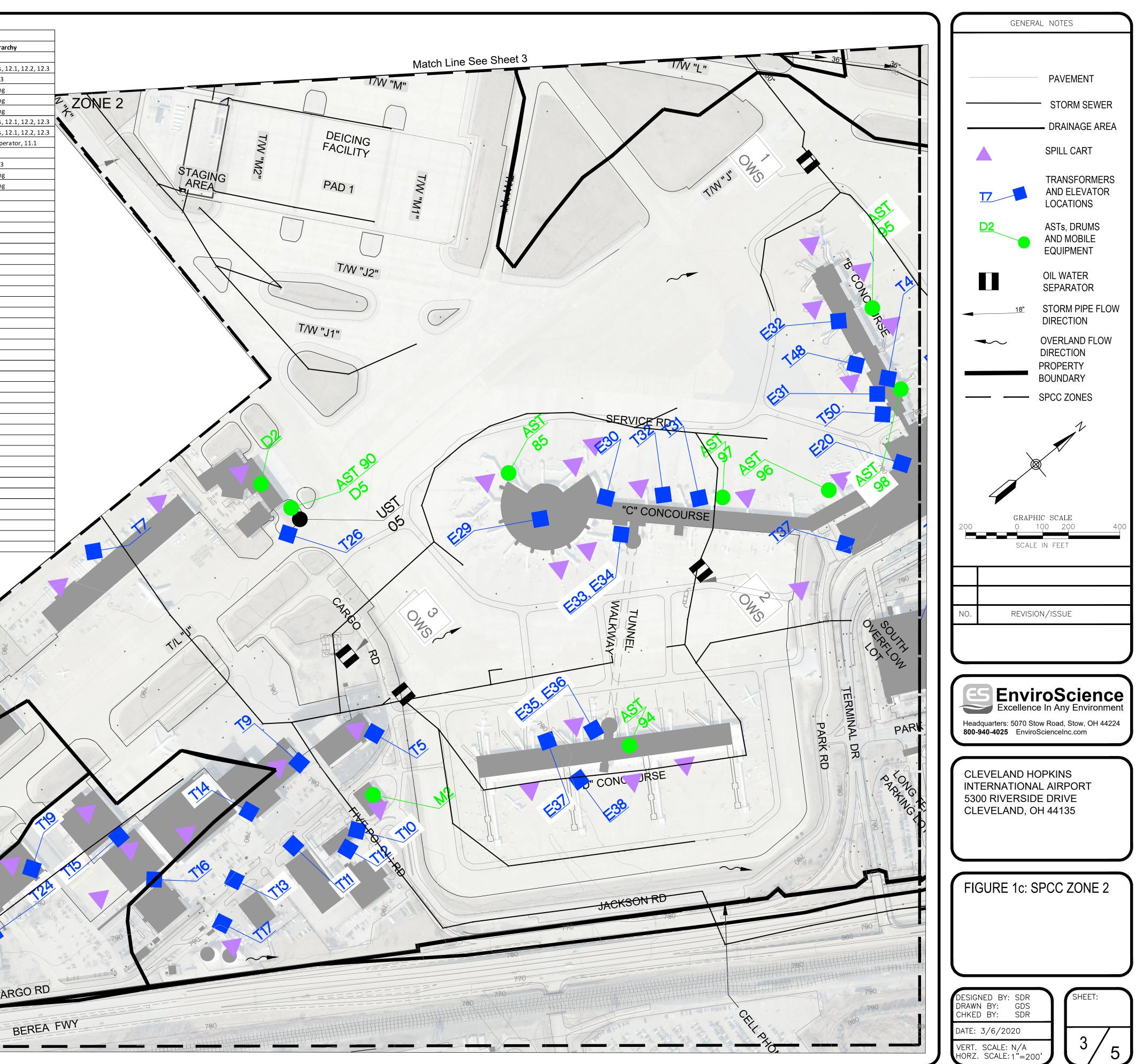
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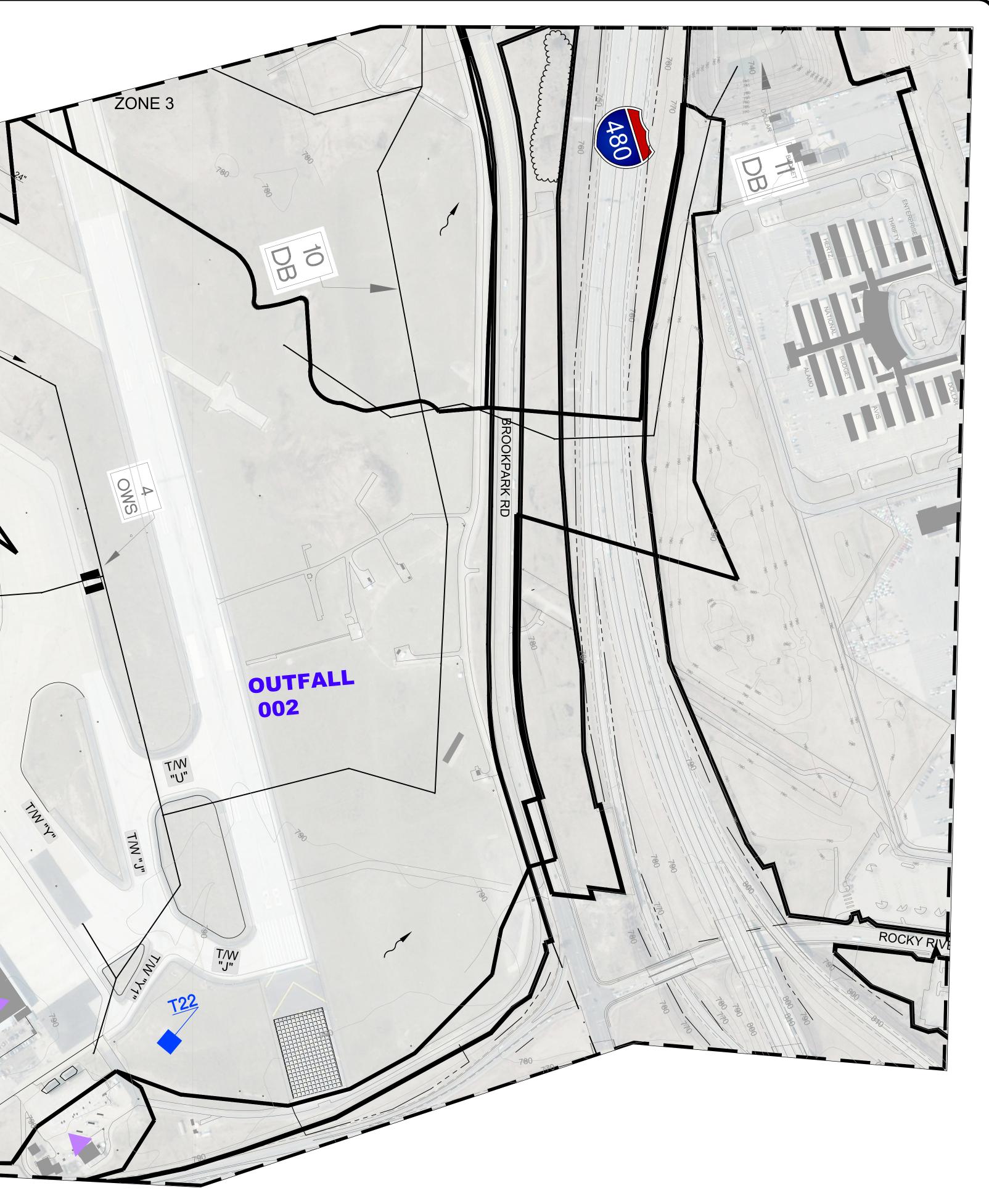
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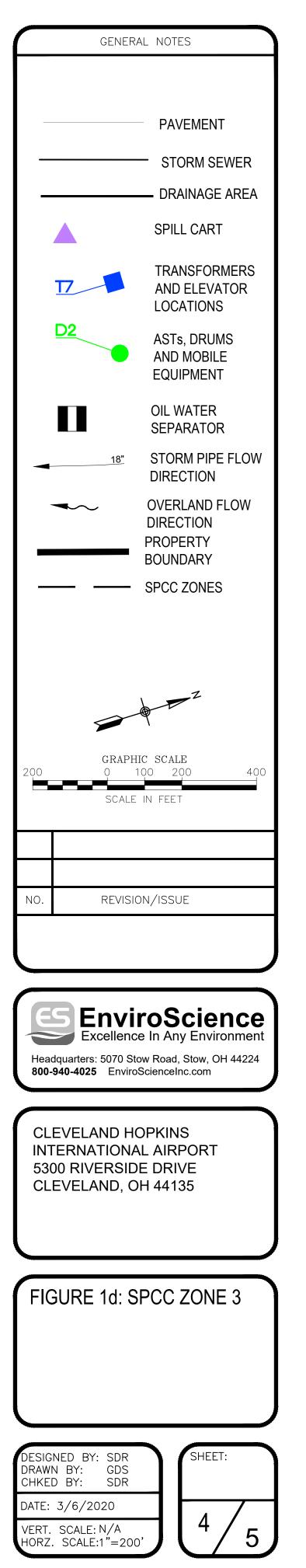
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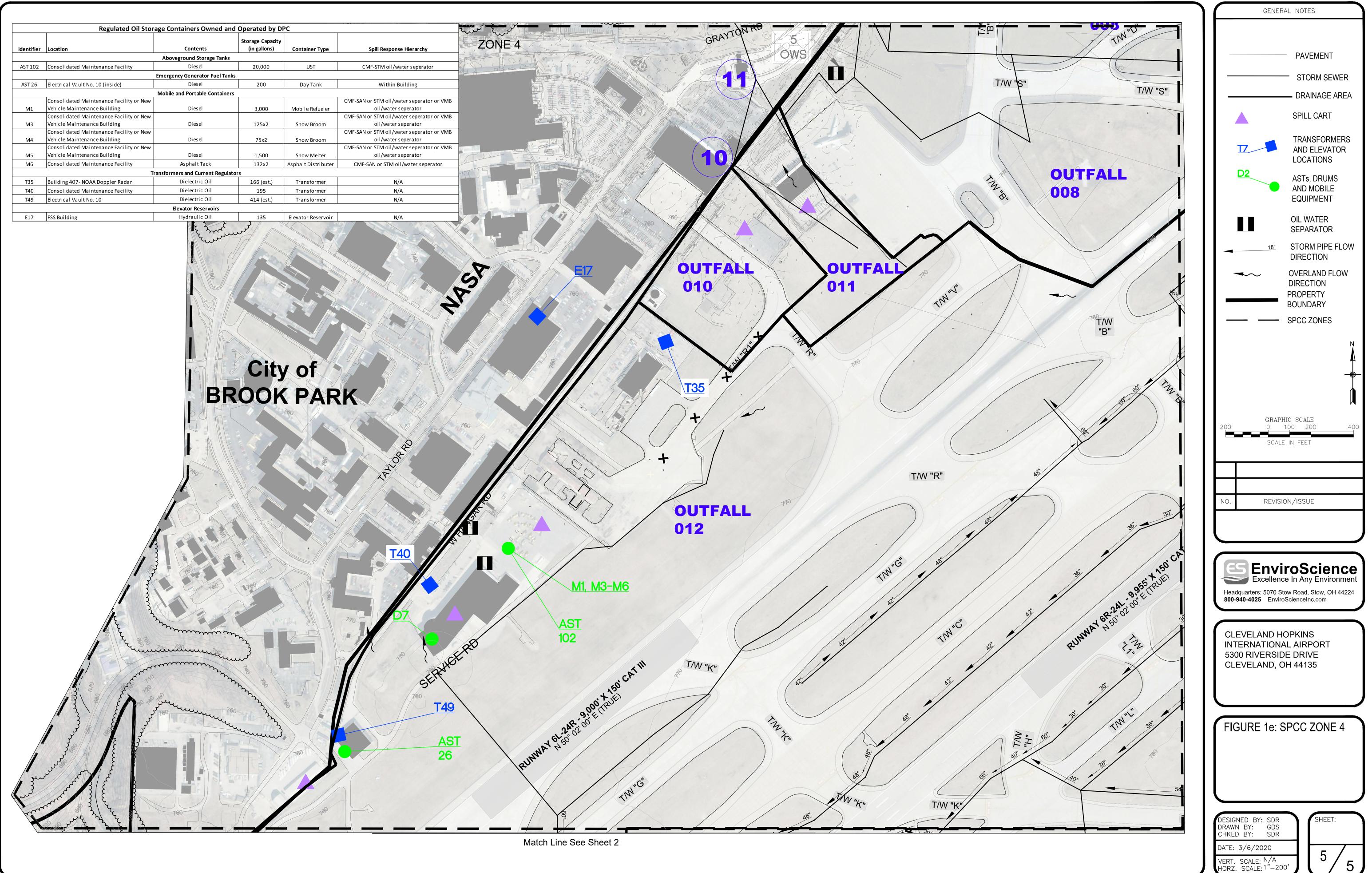
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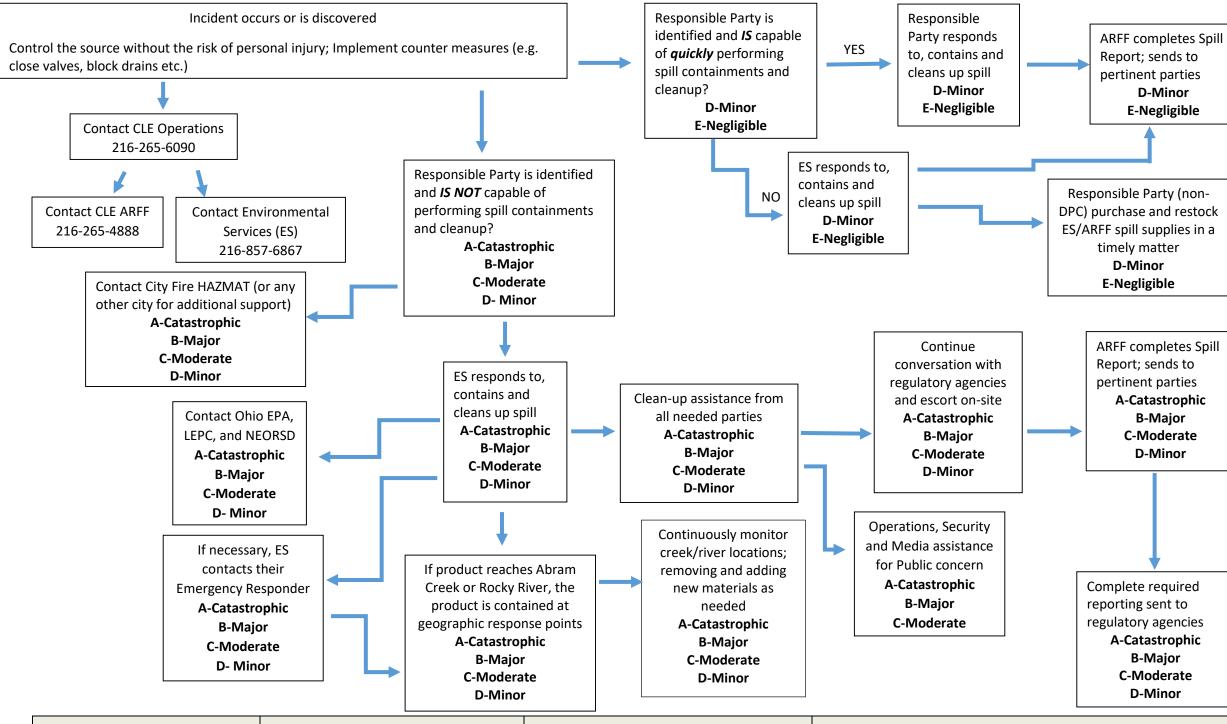


dentifier	Location	Contonto '		Comboin		
	Fmo	Contents rgency Generator Fuel 1	(in gallons) Fanks	Container Type	Spill Response Hierarchy	-
AST 06	Electrical Vault No. 6- Short Term Parking Garage	Diesel	1,250	Belly Tank	E-8 Oil/water seperator, 12.1, 12.2, 12.3	1
AST 80	Electrical MS No. 2- Moat (inside)	Diesel	250	Day Tank	Within Building	
AST 93	Electrical Vault No. 14- Short Term Parking Garage	Diesel	1,500	Belly Tank	Within Building	
	Transfo	ormers and Current Reg	ulators		1	-
T3	Corporate Wings Hangar, M.A., BP	Dielectric Oil	318	Transformer	N/A	SUC.
T22	BP Fuel Farm	Dielectric Oil	130	Transformer	N/A	
		Elevator Reservoirs	.			
E1	Terminal Building- Bridge/Baggage	Hydraulic Oil	210	Elevator Reservoir	N/A	
E2 E3	Terminal Building- Bridge/Baggage Terminal Building-Bridge/RTA (north)	Hydraulic Oil Hydraulic Oil	210 210	Elevator Reservoir Elevator Reservoir	N/A N/A	
E4	Terminal Building-Bridge/RTA (south)	Hydraulic Oil	210	Elevator Reservoir	N/A N/A	
E15	Long Term Garage (south)	, Hydraulic Oil	111	Elevator Reservoir	N/A	
E16	Long Term Garage (north)	Hydraulic Oil	176	Elevator Reservoir	N/A	
E21	Terminal Building-Ticket/Baggage (north)	Hydraulic Oil	210	Elevator Reservoir	N/A	
E22	Terminal- Baggage Makeup/South Ticketing	Hydraulic Oil	129	Elevator Reservoir	N/A	7
E25	Chapel/Building Maintenance	Hydraulic Oil Hydraulic Oil	135	Elevator Reservoir	N/A	
E26 E27	Custodial Office/North Moat Concourse A-Customs	Hydraulic Oil	135 129	Elevator Reservoir Elevator Reservoir	N/A N/A	
E28	Concourse A- End	Hydraulic Oil	129	Elevator Reservoir	N/A N/A	
E39	Concessions Freight Elevator	Hydraulic Oil	116	Elevator Reservoir	N/A N/A	
	Watch Line See C.	E laande de la companye de la compan		NCOURSE AST 80 E27		









A - Catastrophic	B - Major	C - Moderate	D - Minor	E - Negligible		
Massive Effect	Major Effect	Contained Effect	Minor Effect	No Effect		
≥10,000 gal; reported to LEPC; loss to waterway, soil, neighboring roadway or property, etc.; has left airport property; major to catastrophic health effects; closure of airport; closure and/or evacuation of neighboring properties and/or roadways; uncontrolled hazardous environment.	≥250 gal to ≤10,000 gal; reported to LEPC; loss to waterway, soil, neighboring roadway or property, etc.; has left airport property; moderate to major health effects; airport pavement closures 1 day; closure of airport; closure and/or evacuation of neighboring properties and/or roadways; sustained immediate hazardous environment.	≥25 gal to ≤250 gal; reported to LEPC and Ohio EPA; loss to sewer, waterway, ditch, soil, etc.; overflows or bypasses oil-water separator; has not left airport property (i.e. temporarily trapped in detention/retention basin (last line of defense)); minor to moderate health effects; pavement closures 4 hours; short period of immediate hazardous environment.	≥5 gal to ≤25 gal; no or minor (i.e. sheen to 5 gal, reported to Ohio EPA); loss to sewer, waterway, ditch, etc.; loss to sewer but within oil-water separator catchment; crosses pavement joints and/or occurs on distress/cracked pavement; enters soil and/or grass; trapped in snow/ice; identified/reported within 30 mins to several hours of spill; active leak; vehicles have driven through material or pedestrians have tracked; minor decontamination of vehicle or pedestrians; minor health effects (i.e. irritation); closed pavement (taxiway, runway, ramp, gate) but alternative routes quickly available; delayed aircraft operations (deplane passengers, plane cannot pushback).	0 to ≤5 gal; occurs indoors or under cover; no loss to sewer, waterway, ditch, etc.; does not cross pavement joint or distressed/cracked pavement; does not occur on or enter soil or grass; not trapped in snow/ice; identified/reported immediately or within short period of time (~30 mins) and no active leak; vehicles have not driven through material; no immediate health effects (i.e. no fire, immediately hazardous environment), no impact on aircraft operations.		



Spill Response/Notification Procedures Cleveland Hopkins International Airport

Noti cations				
Organization	Contact Number			
CLE Operations	216-265-6090			
CLE ARFF	216-265-4888			
CLE Environmental Services	216-857-6867 216-857-7036 216-857-7587			
Cuyahoga County LEPC	216-771-1365			
Ohio EPA	800-282-9378			
National Response Center	800-424-8802			
NEORSD	216-641-3200			
NASA FOC Dispatch	216-433-2088			

Responsible Party (non-DPC) purchase and restock ES/ARFF spill supplies; Pay all spill related outside parties' invoices in a timely manner A-Catastrophic

B-Major C-Moderate D-Minor

Calculations for Estimated Volume of Linear

Spill



Example: Hydraulic fluid leak from moving equipment; red area represents spill.

Calculation Parts:

Length: (measured or paced distance of spilled fluid) Width: (approximate average width) Depth: (assume 0.002' which is 1/32" if depth is not measurable) 7.48: (gallons per cubic foot)

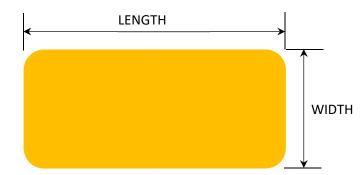
Calculation: Length x Width x Depth x 7.48

Example Calculation:

561' length x 1.5' width x 0.002' x 7.48 = **12.58 gallons**, round to 13 gallons.

Calculations for Estimated Volume of

Rectangular Spill



Example: Fuel spill on flat concrete; yellow area represents spill.

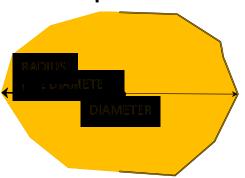
Calculation Parts:

Length: (approximate average length) Width: (approximate average width) Depth: (assume 0.002' which is 1/32" if depth is not measurable) 7.48: (gallons per cubic foot)

Calculation: Length x Width x Depth x 7.48.

Example Calculation: 40' length x 20' width x 0.002' x 7.48 = **11.96 gallons**, round to 12 gallons.

Calculations for Estimated Volume of Circular Spill



Example: Fuel spill on flat concrete; yellow area represents spill.

Calculation Parts:

2) measurable)

Calculation: Pi x Radius² (or Radius x Radius) x Depth x 7.48.

Example Calculation: 25' diameter spill = 25' x 0.5 = 12.5' (Radius) x 12.5' (Radius) = 156.25 (Radius²) x 3.14 (Pi) x 0.002' (Depth) x 7.48 = **7.34 gallons**, round to **8 gallons**.

To measure without walking into spill, measure nearby concrete slab and estimate width. Use longest radius to be conservative.

Radius: (0.5 x diameter or ½ of diameter = diameter /

Pi: (3.14 or "∏" on calculator) **Depth:** (assume 0.002' which is 1/32" if depth is not 7.48: (gallons per cubic foot)